

Tall Buildings (Building Heights)

Supplementary Planning Document

The following Tall Buildings (Building Heights) Supplementary Planning Document (SPD) is a draft document only and is for consideration by the Harrow Planning Policy Advisory Panel. The draft SPD is a live document and will continue to evolve as the approach, terminology, content and images are developed. This includes refining linkages with other relevant Supplementary Planning Documents and incorporating Design Review Panel advice.

**London Borough of Harrow
Tall Buildings (Building Heights)
Supplementary Planning Document**



This document provides guidance on the design, suitability and sensitivity of tall and contextually buildings within suburban areas of the London Borough of Harrow.

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The SPD draws upon the Harrow Characterisation and Tall Buildings Study prepared by Allies and Morrison Urban Practitioners.

Graphic Design by London Borough of Harrow.

Published X 202X

This is a draft version for consultation.

Some images in this document are placeholders awaiting new photography which will be incorporated ahead of adoption.

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1.0

Introduction

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Why is this Supplementary Planning Document being prepared?

- 1.1.1 This draft Supplementary Planning Document (SPD) sets out detailed guidance for planning applications proposing buildings which are tall or contextually tall within suburban locations within the London Borough of Harrow. In doing so, it provides further guidance to policies within the Harrow Local Plan for proposals for that are tall, or taller than the prevailing pattern of development in suburbia.
- 1.1.2 This SPD only applies to areas outside of the Harrow & Wealdstone Opportunity Area.
- 1.1.3 The Tall Buildings ('Building Heights') SPD will build on the Harrow Characterisation and Tall Building Study, which was completed in August 2021 by Allies & Morrison Urban Practitioners. This study is a twofold evidence base, by firstly

providing a contemporary character study of the entire borough. This assists by setting a baseline of character across the borough, from which a contextual analysis is able to be undertaken, which allows a definition of a tall building to be determined in different locations across Harrow. Specifically for the purposes of this SPD, the study provides a clear evidence base demonstrating the predominantly suburban character of Harrow. This SPD provides guidance in relation to building heights within that suburban context.

- 1.1.4 The Tall Buildings ('Building Heights') SPD also provides guidance so that proposals for tall or contextually tall buildings achieve a high quality of design.

What is the process for preparing the SPD?

- 1.1.5 This SPD has been prepared through a collaborative process and building upon previous relevant evidence base carried out within the borough. An initial scoping report, including a draft set of design objectives and principles, and how the SPD would address tall building applications within suburban Harrow, was considered by elected members at the Planning Policy Advisory Panel (PPAP) meeting in October 2022. Following that meeting, the drafting of the SPD was progressed following best practice guidance, which enabled a first draft to be presented to the PPAP in January 2023.

- 1.1.6 Consultation with internal departments (Development Management, Environmental Health, Waste & Recycling, Highways Authority, Landscape/Biodiversity, Heritage) was undertaken, to receive views from officers who would use the document as part of the decision taking process. As well as this, external stakeholders were engaged with such as the Metropolitan Police and Greater London Authority, with independent design advice sought from the borough's Design Review Panel.

- 1.1.7 Following feedback from the Planning Policy Advisory Panel, an amended draft was presented to Cabinet in XXX 2023 for approval to consult.

Formal Consultation

- 1.1.8 This paragraph will be added prior to draft consultation.

Participating in the development of the draft Building Heights SPD

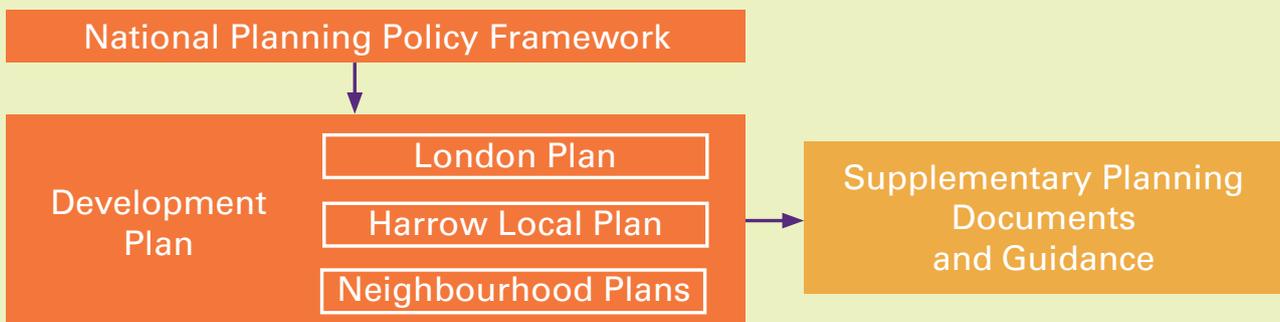
1.1.9 This paragraph will be added prior to draft consultation.

Status

1.2

1.2.1 Once adopted the final Tall Buildings ('Building Heights') SPD will form a material consideration in determining applications for tall and contextually tall buildings within suburban Harrow. This means that in addition to satisfying the requirements of national, regional and local planning policies (as expressed in the borough's development plan - comprising the London Plan and Harrow

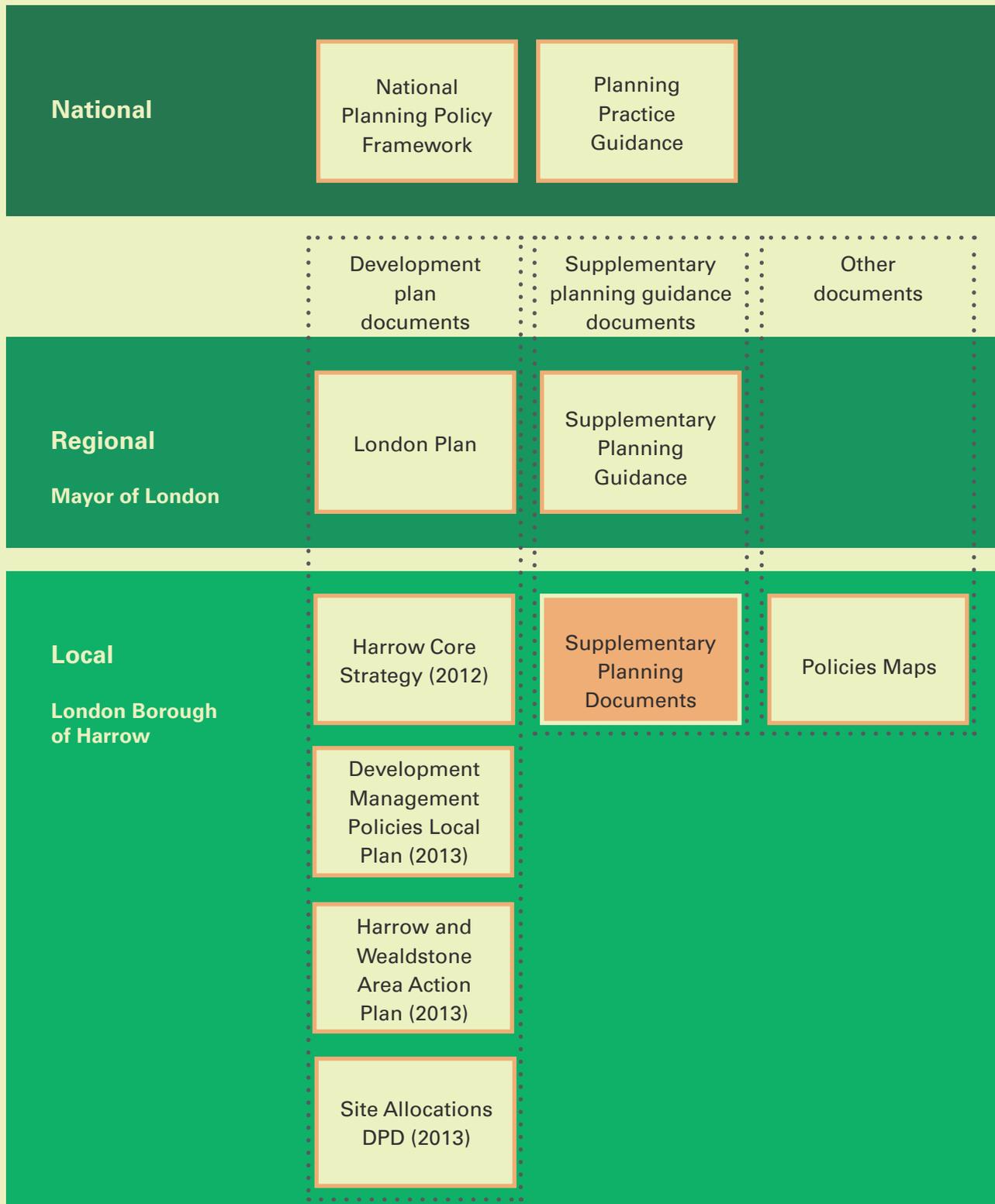
Local Plan), development proposals relating to the development of tall and contextually tall buildings will also need to demonstrate how the guidance in this SPD has been considered. The Council intends to further implement this guidance into a future Local Plan, giving it even greater weight as part of the borough's development plan



1.3.1 The production of the Harrow Tall Buildings ('Building Heights') SPD has been progressed in accordance with relevant legislation, guidance and policy, to ensure that it reflects

national, London-wide and borough policies as well as best practice guidance from other national bodies active in the built environment.

The planning policy hierarchy



National Planning Policy Framework (2021)

- 1.3.2 The National Planning Policy Framework (NPPF) does not provide specific national guidance on the development of tall buildings. However, paragraphs 119 and 124 of the NPPF state that “planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”
- 1.3.3 Chapter 12 of the NPPF set out requirements in relation to achieving well-designed places, where paragraph 126 states “Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this”
- 1.3.4 A central theme of the NPPF 2021 is that good design is a key aspect of sustainable development, creating better places in which to live and work and make development acceptable to communities. In this context, Paragraph 124 of the NPPF states:
- 1.3.5 Planning policies and decisions should support development that makes efficient use of land, taking into account:
- A. the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - B. local market conditions and viability;
 - C. the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - D. the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - E. the importance of securing well-designed, attractive and healthy places.”

London Plan (2021)

- 1.3.6 The London Plan is the spatial development plan for Greater London, and forms part of the development plan for the London Borough of Harrow. The most recent London Plan was published in March 2021. This introduced Policy D9 (Tall buildings) which provides a prescriptive policy on the approach to tall buildings across London.
- 1.3.7 All planning applications must be assessed against the development plan, which in London includes the London Plan (2021). Therefore applications must demonstrate compliance with the London Plan, along with Local Plan documents also.
- 1.3.8 Policy D9 of the London Plan (2021) sets out that tall buildings are based on local context, and that the definition of a tall building would vary from place to place. To be considered a tall building in relation to Policy D9 of the London plan (2021), a building should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This purely relates to a definition of a tall building, not the suitability of a tall building in a particular location.
- 1.3.9 New development that is taller than its surrounding context, but does not meet the definition of a tall building as set out in Policy D9 (Tall buildings) of the London Plan (2021), will not automatically be considered as acceptable. The acceptability of a building taller than its surroundings, will be subject to consideration against guidance in this SPD, and also relevant policies within the development plan as a whole.

Harrow Local Plan

1.3.10 Within Harrow, the development plan is made up of the London Plan and the:

- A. Harrow Core Strategy (2012)
- B. Harrow Development Management Policies Local Plan (HDMPLP) (2013)
- C. Harrow & Wealdstone Area Action Plan (2013)
- D. Site allocations DPD (2013)
- E. Policies Maps

1.3.11 The Harrow & Wealdstone Area Action Plan (2013) provides detailed implementation policies, including tall buildings / building heights / site allocations. Development within the Harrow & Wealdstone Opportunity Area must respond to policies within the Harrow & Wealdstone Area Action Plan (2013).

1.3.12 This SPD does not apply within the Harrow & Wealdstone Opportunity Area. Opportunity Areas are designated through the London Plan, and are noted as areas where growth is directed to and are subject to significant change. It is recognised that the Harrow & Wealdstone Opportunity Area represents where growth has been strategically directed to over the local plan period, and as such has already undergone significant change including many tall building developments. This SPD will only apply to the suburban context of Harrow, which is outside of the designated Harrow & Wealdstone Opportunity Area, where the development plan does not envision such significant change and development opportunities.

1.3.13 Currently, the Harrow Development Management Policies Local Plan (2013) does not contain a specific policy in relation to tall buildings. By reason of this, there are no

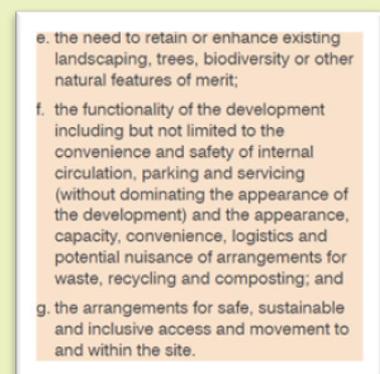
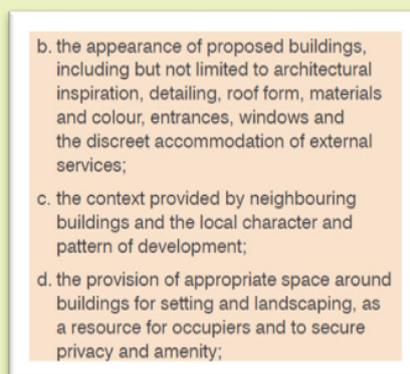
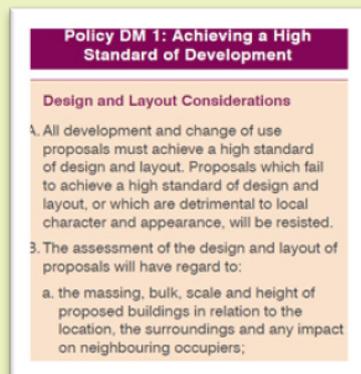
areas outside the Opportunity Area within the borough that are identified as being appropriate or inappropriate for tall building development.

1.3.14 Policy DM1 (Achieving a High Standard of Development) provides policy seeking to ensure that all developments must achieve a high standard of design and layout. Specifically in relation to height, Policy DM1 sets out that in assessing design and layout, applications must have a regard to massing, bulk and height in relation to the location in which it is situated. It goes onto provide direction to assess the context provided by neighbouring buildings and the local character and pattern of development. Full text of Policy DM1 (Achieving a High Standard of Development) is set out below as figure XX.

1.3.15 This SPD provides additional detail and design guidance in relation to DM1, specifically to assist applications address the assessment requirements for buildings that are proposed as tall or taller than their suburban surroundings. Tall or contextually taller building applications will need to consider all other relevant policies within the Development Plan.

1.3.16 This SPD provides guidance in relation to determining what would be defined as a contextually tall building in suburban locations, along with guidance to ensure a high quality development is delivered. There may also be other relevant SPDs subsequently adopted by the Council and the Council's website should be reviewed to identify these.

1.3.17 Guidance provided within this SPD will inform a tall buildings policy within the new local plan.



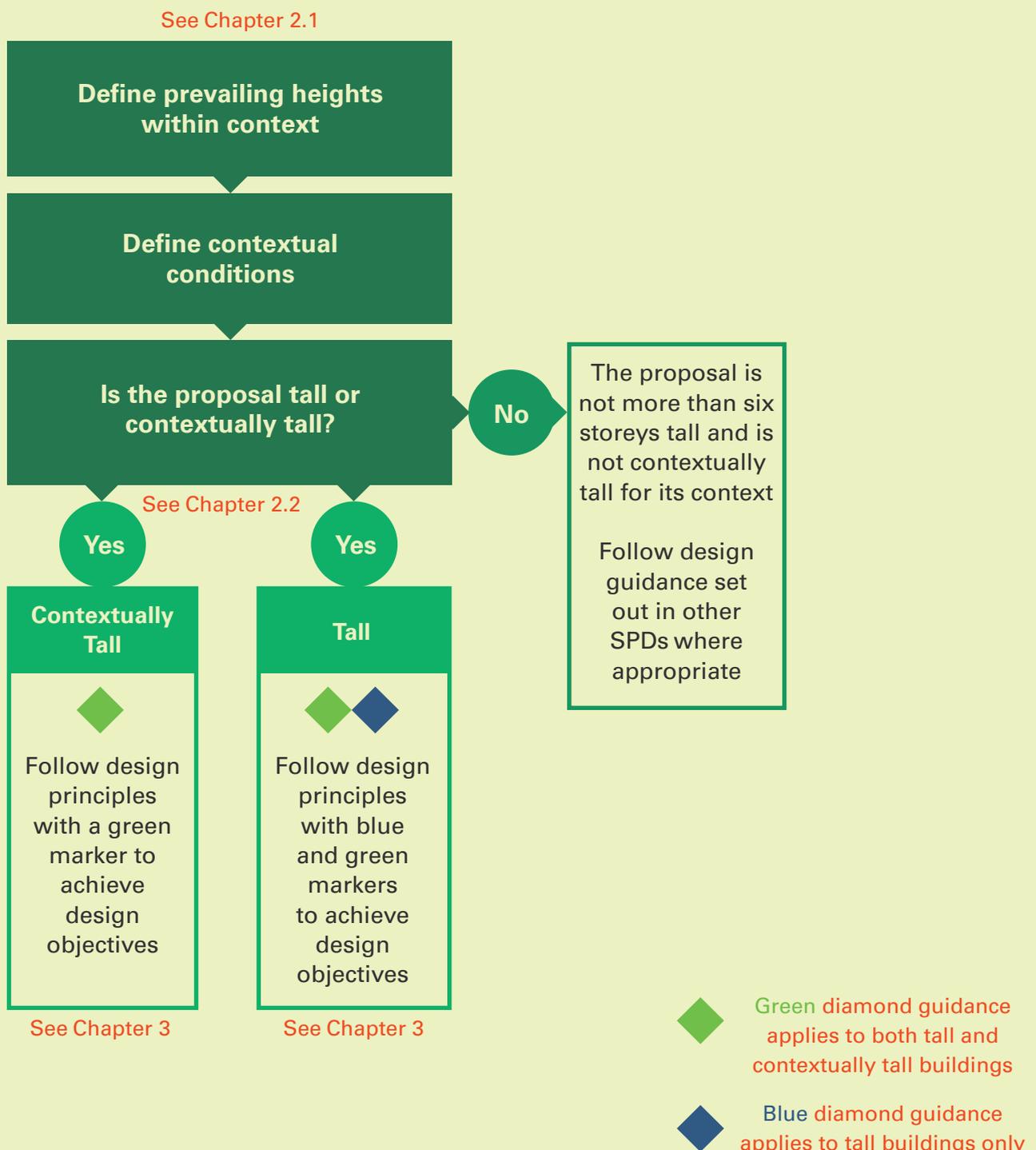
Harrow Garden Land Supplementary Planning Document (2013)

- 1.3.18 Applicants should have regard to the Garden Land SPD to ensure that there is no conflict with garden land development.

Historic England-Tall Buildings Advice Note

- 1.3.19 Historic England's guidance on tall building's is set out in 'Advice Note 4'. This document reflects the importance of preserving the historic environment when planning for tall buildings. Historic England recommend that local planning authorities adopt a plan led approach to managing tall buildings.
- 1.3.20 Part 3 of the advice note relates to Local Plans and states: "In a successful plan-led system, the location and design of tall buildings will reflect the local vision for an area, and a positive, managed approach to development, rather than a reaction to speculative development applications."

1.4.1 This SPD provides guidance for assessing the context for applications where tall (as defined by the London Plan) or buildings that are taller than the prevailing suburban pattern of development (referred to as 'contextually tall') are proposed. It also provides guidance on defining a tall building in relation to that context, along with guidance to assist in achieving a high quality of development for such proposals.



2.0

Understanding Harrow's Existing Character

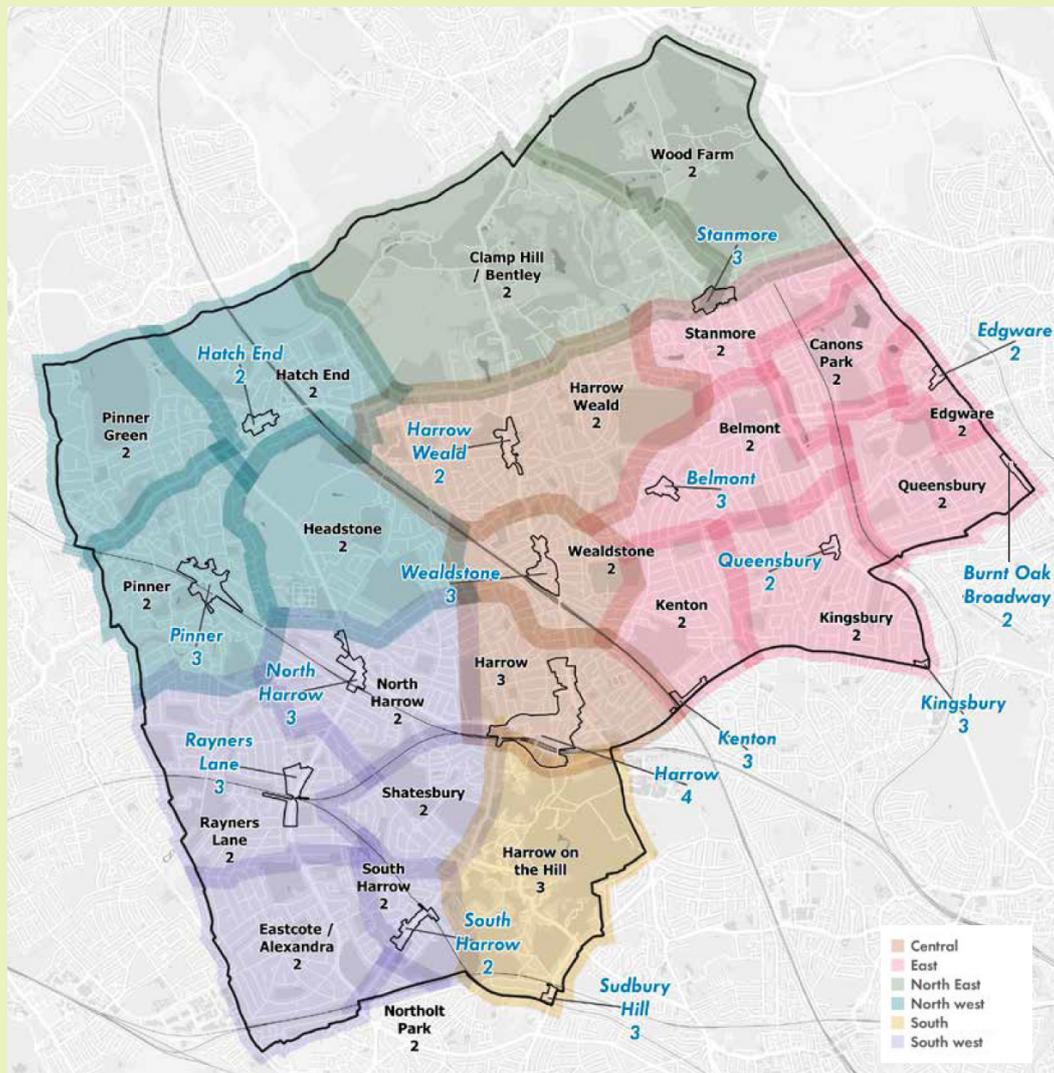
- 2.1.1 The Council recognises Harrow's place as an outer London borough, and is seeking to achieve sensitive densification of its suburban areas. This will result in more development on previously developed or underdeveloped land, or redevelopment of existing sites with additional appropriate density for the suburban context.
- 2.1.2 To achieve this aim in a sensitive manner, development must be highly responsive and respectful of prevailing heights to preserve the existing character of the borough's suburban areas. Specifically, development should have regard to areas of Harrow that have a suburban or village feel to them, and not have a detrimental impact on that character. Where height is to be brought forward, this will be done in the right location and be of the right quality.
- 2.1.3 Many of the benefits associated with tall buildings apply to higher density schemes of all types rather than tall buildings per se. Compact living can reduce energy consumption per household, give good access to shops and services and support these uses; and encourage active and public transport, reducing reliance on cars. Buildings with additional height may also assist in delivering community facilities and amenities that residents need, so Harrow becomes the place they want to spend their time and money, creating a thriving local economy and supporting local Harrow businesses.
- 2.1.4 However, these benefits can only be realised if the social infrastructure, commercial uses and public transport are in place to support a shift in behaviour. High density living without these surrounding characteristics can result in overcrowded, isolated and car dominated areas.
- 2.1.5 The focus for Harrow will be to provide a range of homes across the borough, with typologies that suit their context (both in terms of townscape and quality of life) and can integrate well with surroundings. Fundamentally, to meet housing need the focus will be on density rather than tall buildings. Tall buildings should be considered exceptional, both in their frequency and in their design.

Establishing existing heights in Harrow

2.2.1 This section provides guidance in determining what would constitute a contextually tall building within suburban locations. To determine what would be a contextually tall building, applications will need to consider a number of elements.

2.2.2 In term of the built character of suburban Harrow, and as displayed below in Figure 2, the majority of building stock is largely between 2 to 3 storeys.

2.2.3 Almost two-thirds of Harrow’s housing stock dates from the inter-war period. Significant neighbourhoods of semi-detached and short terraces appeared rapidly as fields became homes, gardens, streets, parades and recreation grounds. This suburban housing typology continues to be one of the principal characteristics of Harrow’s suburbs, particularly to the south east and south west of the borough. Figure 2 demonstrates how much of the borough is suburban, or nonetheless has height of 2 to 3 storeys.



The plan above illustrates the prevailing height for each neighbourhood (black text) and town centre (blue text). Prevailing heights are generally between 2- 3 storeys across the borough, with the exception of Harrow town centre which sit at 4 storeys. This is reflected in the summary table on the following pages.

Summary table of prevailing heights; context-based definitions of tall buildings; and the London Plan (2021) Policy D9 definition.

	Neighbourhood / Town Centre	Prevailing Height (storeys)	Contextually Tall (storeys)	Tall London Plan Policy D9 (storeys / metres)
North West	Pinner	2	> 4	6 / 18m
	Pinner Town Centre	3	> 6	6 / 18m
	Pinner Green	2	> 4	6 / 18m
	Hatch End	2	> 4	6 / 18m
	Hatch End Town Centre	2	> 4	6 / 18m
	Headstone	2	> 4	6 / 18m
South West	North Harrow	2	> 4	6 / 18m
	North Harrow Town Centre	3	> 6	6 / 18m
	Rayners Lane	2	> 4	6 / 18m
	Rayners Lane Town Centre	3	> 6	6 / 18m
	Eastcote/ Alexandra	2	> 4	6 / 18m
	Shaftesbury	2	> 4	6 / 18m
	South Harrow	2	> 4	6 / 18m
	South Harrow Town Centre	2	> 4	6 / 18m
NE	Northolt Park	2	> 4	6 / 18m
	Clamp Hill/ Bentley	2	> 4	6 / 18m
Central	Wood Farm	2	> 4	6 / 18m
	Harrow Weald	2	> 4	6 / 18m
	Harrow Weald Town Centre	2	> 4	6 / 18m
	Wealdstone	2	> 4	6 / 18m
	Wealdstone Town Centre	3	> 6	6 / 18m
	Harrow	3	> 6	6 / 18m
S	Harrow Town Centre	4	> 8	6 / 18m
	Harrow on the Hill	3	> 6	6 / 18m
East	Sudbury Hill	3	> 6	6 / 18m
	Stanmore	2	> 4	6 / 18m
	Stanmore Town Centre	3	> 6	6 / 18m
	Belmont	2	> 4	6 / 18m
	Belmont Town Centre	3	> 6	6 / 18m
	Canons Park	2	> 4	6 / 18m
	Edgware	2	> 4	6 / 18m
	Edgware Town Centre	2	> 4	6 / 18m
	Queensbury	2	> 4	6 / 18m
	Queensbury Town Centre	2	> 4	6 / 18m
	Burnt Oak Broadway	2	> 4	6 / 18m
	Kingsbury	2	> 4	6 / 18m
	Kingsbury Town Centre	3	> 6	6 / 18m
	Kenton	2	> 4	6 / 18m
Kenton Town Centre	3	> 6	6 / 18m	

Establishing context

2.2.4 The map of existing prevailing heights assists in providing a general understanding of prevailing heights across the borough. However, an assessment of context cannot be achieved by looking at this map alone, as prevailing height differs across the suburbs and at a more localised level.

2.2.5 As such any application must provide a detailed analysis of the context in which it is proposed. This will vary from place to place across the borough, and have a direct impact on what further height may be considered acceptable.

2.2.6 Applicants will need to provide a detailed assessment of the wider suburban area that a development is proposed within in order to determine what is 'contextually tall' is for a given suburban context. Following an assessment of prevailing height, applicants should also include the below contextual factors:

Outlier heights

Plot size

Distance between buildings

Built grain / pattern of development

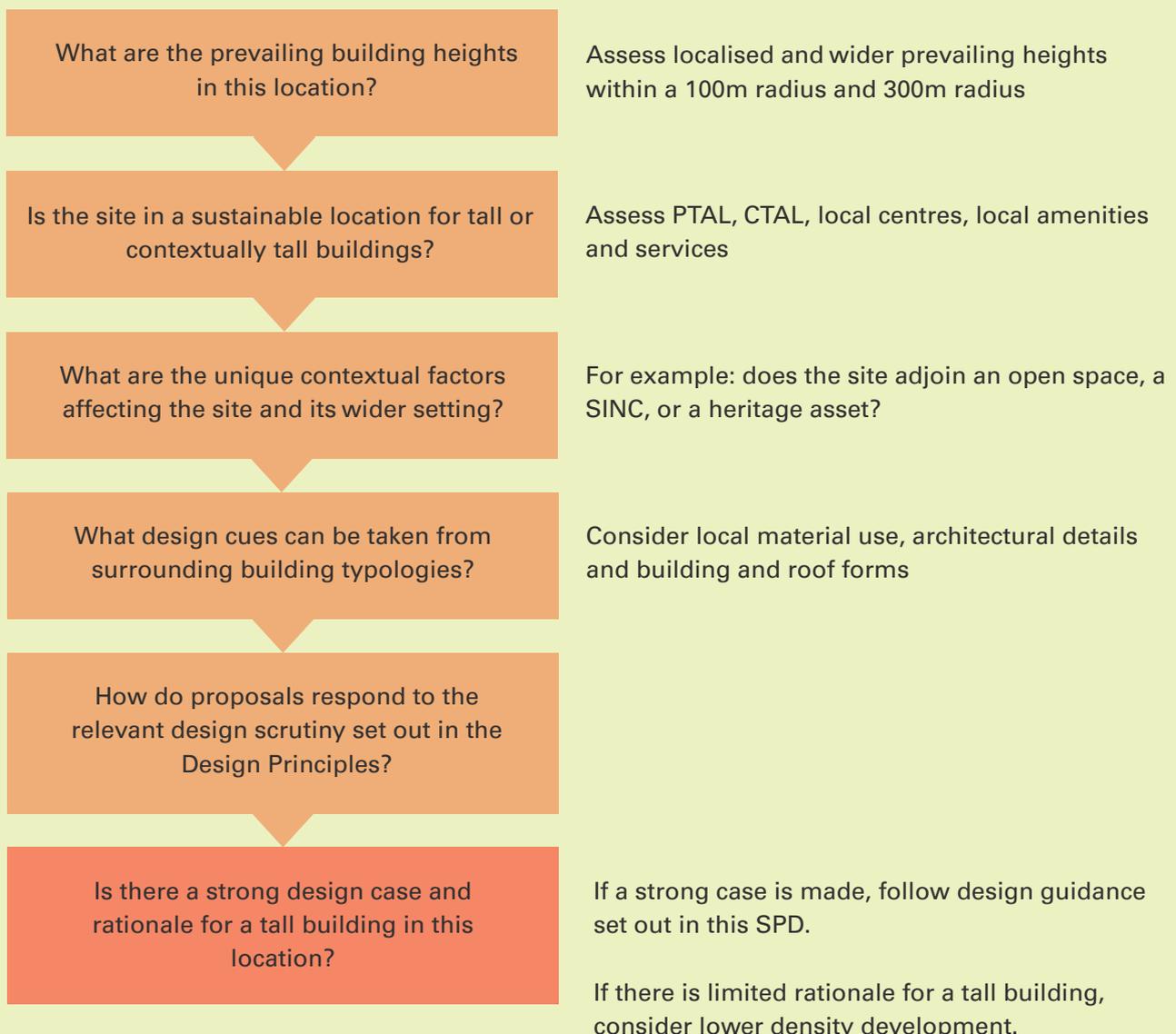
Building lines and setbacks

Road layout

Building use classes

Building typologies and architectural style

Making and assessing the case for a tall building



The London Plan definition of tall

2.3.1 The London Plan 2021 defines a tall building as being **not less than 6 storeys or 18 metres as measured from ground to the floor level of the uppermost storey**. Buildings which meet

this threshold will be required to follow design guidance as set out in Policy D9 of the London Plan.

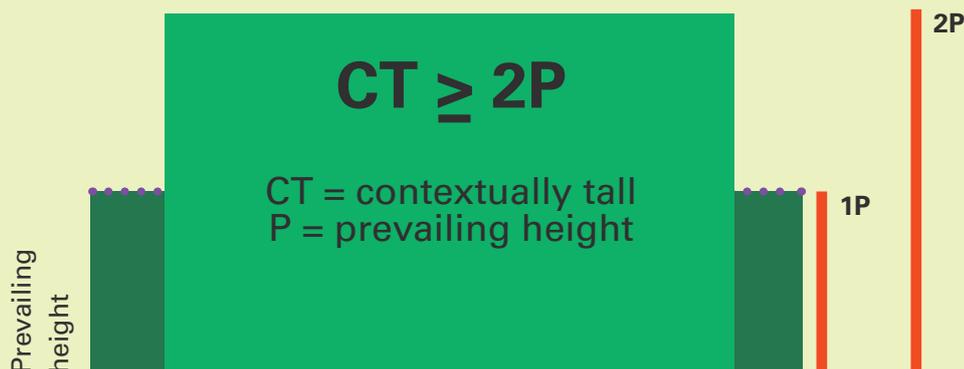


The minimum height of a tall building as defined by the London Plan

LB Harrow's definition of contextually tall

2.4.1 Following an assessment of the suburban context as detailed above, the following formula assists in providing a definition as to whether a proposed building would be a 'contextually tall building' within a suburban location.

2.4.2 The formula below defines a contextually tall building as being **equal to or greater than twice that of the prevailing height of an area**. This definition is separate to the London Plan 2021 definition of a 'tall building'.



Formula to define contextually tall height within a given area. Contextually tall is equal to or greater than twice the prevailing height

What does a contextually tall building look like?

2.4.3 A contextually tall building is taller than the prevailing heights of its local context and has the potential to cause a significant visual impact on the skyline.



Proposed building is 1x prevailing height (P)

A proposed building height which matches that of its prevailing context presents the least impact on an area and more easily visually integrates with its immediate and wider contexts.



Proposed building is 1.5x prevailing height (P)

A proposed building height which is one and half times that of its prevailing context presents a moderate impact to its immediate and wider visual setting, with the character of an area likely to be affected.



Proposed building is 2x prevailing height (P)

A proposed building height of two times that of the prevailing height (**contextually tall**) will have a significant impact on its wider setting and a potentially detrimental impact on the character of an area.

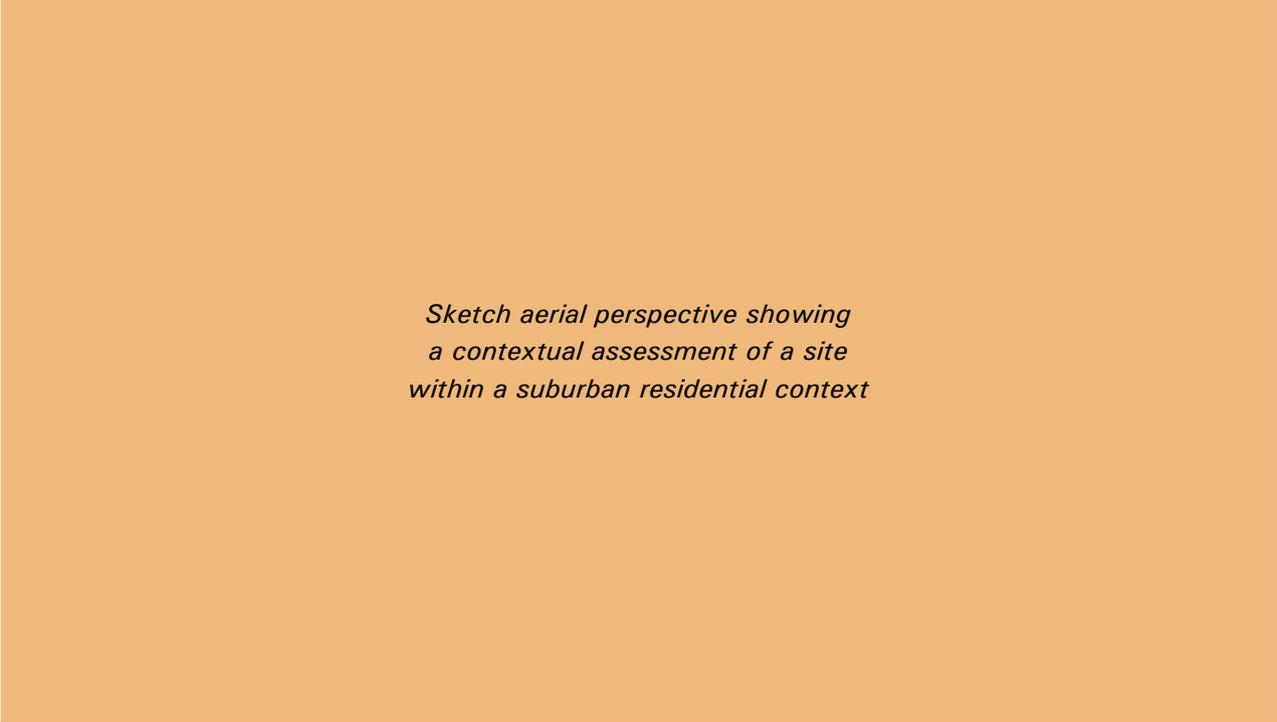
Upward extensions under permitted development

- 2.4.4 In certain circumstances, upwards extensions of buildings may be possible under permitted development rights (see The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended or replaced) ('GPDO').
- 2.4.5 The methodology for a context-based definition of a tall building is intrinsically dependent on prevailing heights. It is noted the propensity for single and two storey upward extensions under permitted development may well gradually increase the prevailing height, though this should not have a dramatic impact due to the interquartile range eliminating the impact of outliers; and the fact neighbourhoods and town centres comprise multiple different typologies, many of which are unlikely to qualify for these new permitted development rights.
- 2.4.6 Where upwards extensions are proposed under permitted development, these must have regard to the guidance within this SPD to the extent covered by the criteria set out the GPDO
- 2.4.7 For example, recent planning appeals have concluded that whether the external appearance of a dwelling is acceptable is inherently linked to how it would be seen in relation to neighbouring buildings and the wider street-scene or landscape. Therefore, the impact of a development on the character and appearance of an area is a material consideration, and the guidance contained within this SPD will assist proposals coming forward under the GPDO.

2.5.1 The following are a selection of worked examples of varying suburban contexts to assist applicants in understanding the expectations of the Local Planning Authority in relation to determining the context of a locality.

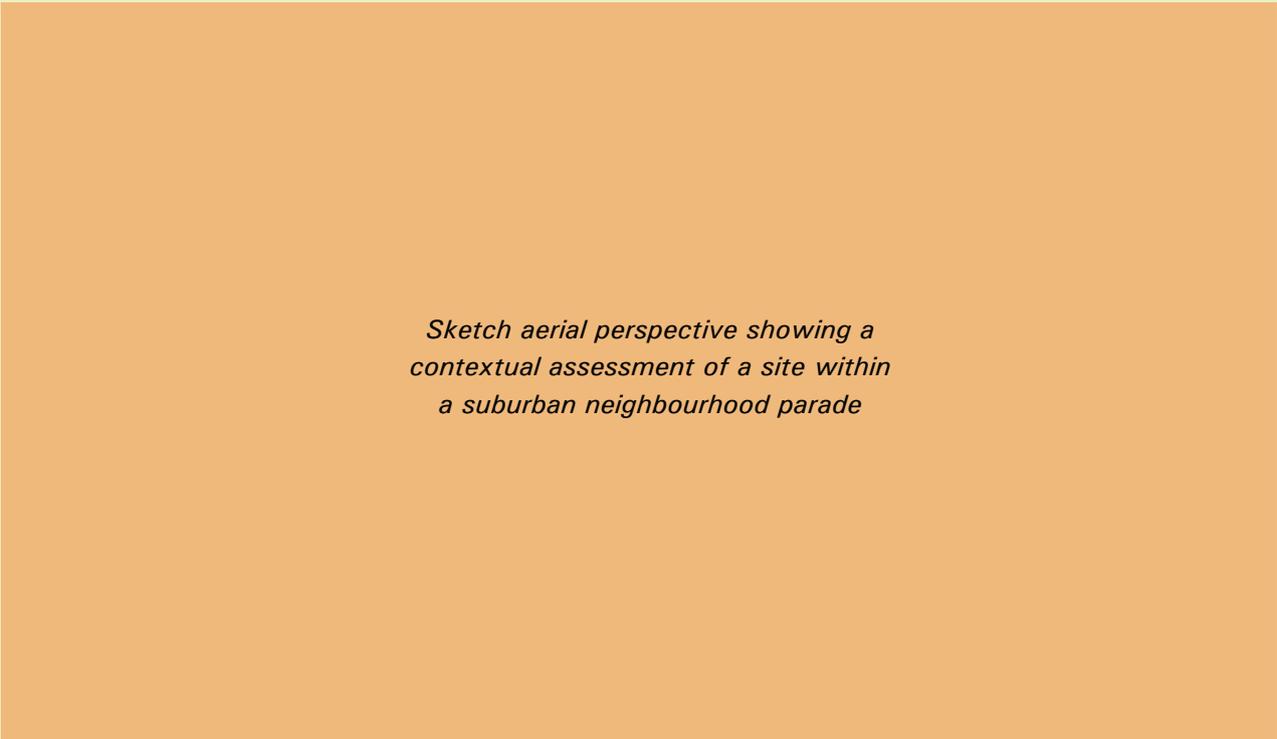
Doing so provides a baseline for how proposed additional height is likely to be considered and what would constitute a contextually tall building.

Example 1: Suburban Residential Context



Sketch aerial perspective showing a contextual assessment of a site within a suburban residential context

Example 2: Suburban Neighbourhood Parade

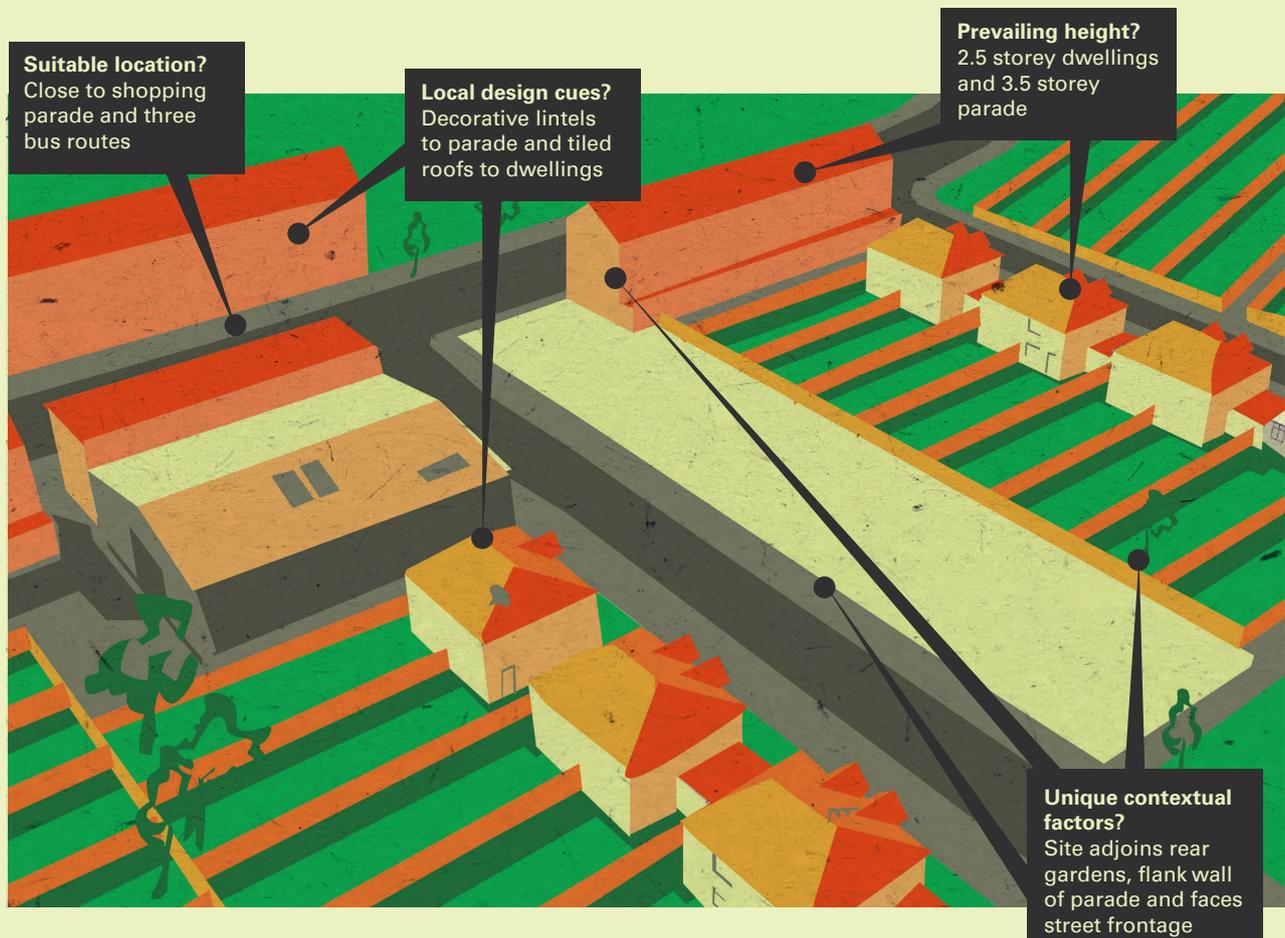


Sketch aerial perspective showing a contextual assessment of a site within a suburban neighbourhood parade

Example 3: Suburban District / Local Centre

Sketch aerial perspective showing a contextual assessment of a site within a suburban district / local centre

Example 4: Suburban Mixed character



Summary

2.5.2 The guidance within this chapter provides assistance in determining what is a tall or contextually tall building in relation to its suburban context. It does not provide any presumption in favour or against a scheme at

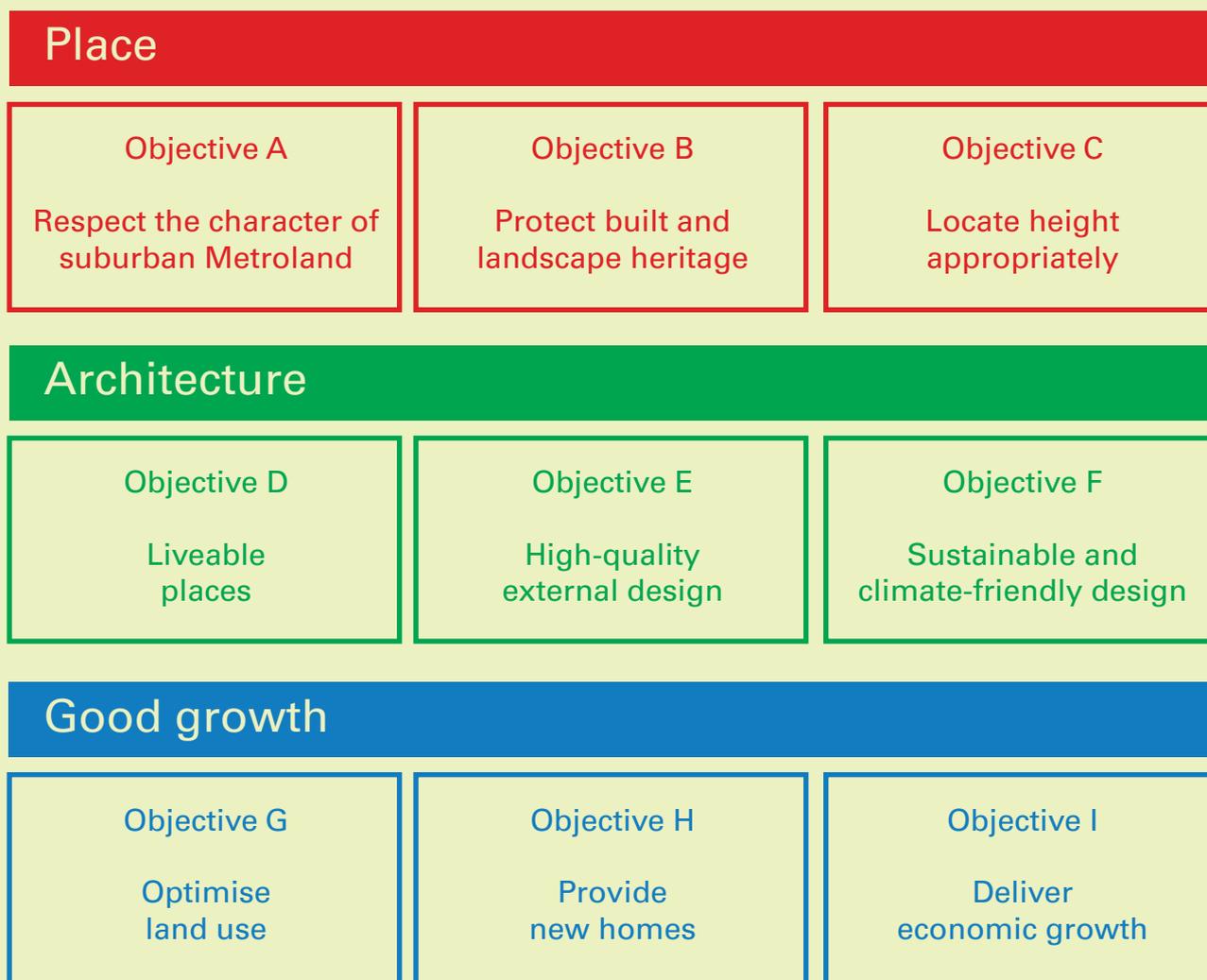
this stage. The remainder of the guidance set out within the SPD (and development plan) must be followed before a determination is able to be made on the acceptability (or not) of a proposal.

3.0

Design Objectives and Principles

3.1.1 Successful tall and contextually tall building development in suburbia must follow the design guidance detailed in Chapter 3 of this Building Heights ('Tall Buildings') SPD. Guidance consists of three overarching themes: **Place, Architecture and Good Growth**. Within these

three themes are 9 objectives (A-I), under which are a range of design principles ensuring that good design is delivered. These principles explain how Applicants should approach the design of tall and contextually tall buildings.



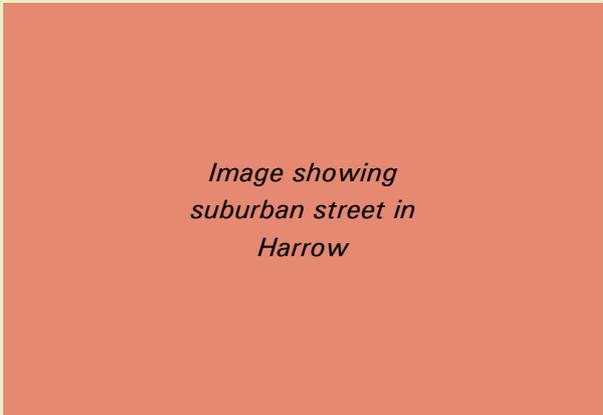
- 3.2.1 Place is the interconnected web of buildings, public and private spaces, natural features, activities and uses, and routes which make up an area and define its character. These characteristics combine with one another to create a uniqueness and identity for an area.
- 3.2.2 Features which make up a place can include historic buildings, the openness of a nearby park, the regular rythm of a suburban street or a tree-lined avenue.
- 3.2.3 An understanding of place is essential in ensuring that new development responds appropriately to its suburban location and that the unique qualities of areas are preserved to strenghten a sense of place.



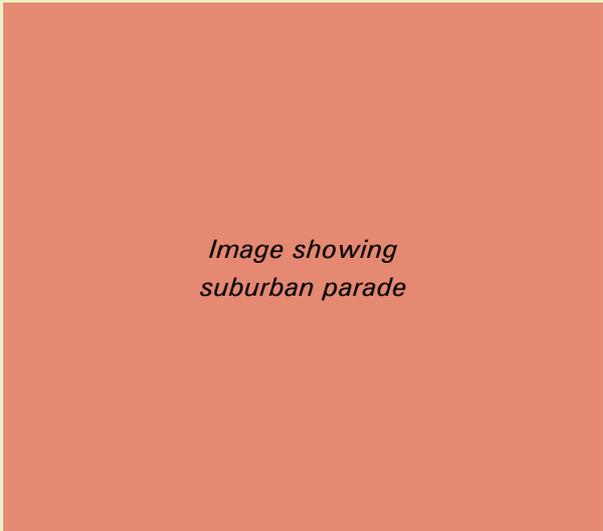
Image showing suburban town centre or parade

Image caption

- 3.3.1 Much of Harrow is made up of suburban areas created through the expansion of the Metropolitan Line in the early 20th century, giving rise to this part of West London's character: Metroland. Metroland is characterised by low-density suburban interwar housing with large gardens and building heights of two to three storeys for dwellings. Housing is often interspersed with interwar shopping parades and district centres which are typically three to four storeys in height.
- 3.3.2 New development that does not respect the pattern of existing development can have a negative impact on the character of suburban areas, eroding a sense of place.
- 3.3.3 Chapter 2.1 shows how a comprehensive context analysis must be undertaken when proposing development in Harrow. 'Development proposals within suburban areas which are taller than the prevailing height will need to be supported by a robust context analysis
- 3.3.4 In developing proposals that respect the character of suburban areas, applications will need to consider impacts on garden land, a prominent feature of the suburbs of Harrow. Many forms of development on garden land in Harrow are resisted through the Harrow Core Strategy (2012), and with further guidance set out in the Harrow Garden Land Supplementary Planning Document (2013). Proposals will be required to comply with the guidance in these documents.
- 3.3.5 In almost all instances, proposals that meet the definition of a tall building within Policy D9 of the London Plan (2021) (6 storeys or 18 metres measured from ground to the floor level of the uppermost storey), will not respect the character of Harrow's suburban areas. Such proposals will not be supported.



*Image showing
suburban street in
Harrow*



*Image showing
suburban parade*

Image caption



Development relates to the existing pattern of suburban development

- 3.3.6 Applications for contextually tall buildings in suburban locations must demonstrate an understanding of their surrounding context. Proposals must ensure they respect the suburban pattern and characteristics of areas outside the Opportunity Area, as those which do not have the potential to cause harm. Proposals which cause excessive harm are unlikely to be supported.
- 3.3.7 Proposals for contextually tall buildings must be supported by a robust context analysis which identifies the qualities of the existing

pattern of development: such as built grain, scale, building lines and the proportions of streets and frontages.

- 3.3.8 All proposals must respond to these contextual attributes and demonstrate how any proposed building footprint, height and massing would be appropriate to an area.
- 3.3.9 Applicants must also ensure that proposals align with design principles within the Garden Land SPD and any other relevant SPD .



Image showing low-rise new development in suburbia



Image showing low-rise new development in suburbia

Image caption



Increased height is proportional to local prevailing heights

- 3.3.10 Building heights which are contextually tall have the potential to cause harm to the character of suburban areas when there is a significant difference between proposed and prevailing heights.
- 3.3.11 Proposed height must respond contextually to existing (and consented) prevailing height across suburbia. What level of height is contextually appropriate will depend on an assessment of prevailing heights and the character and built grain of an area. For example, an area with a mixed character and varying building heights may be able to accommodate greater height than other areas.
- 3.3.12 Increased height can be achieved sensitively through a gradual increase in height over prevailing heights. For larger sites in suburban areas, a series of incremental increases in height can create a less-disruptive transition between a low-density context and a higher-density development.
- 3.3.13 Massing at site edges and boundaries should respond to neighbouring heights. Increased height at site edges, specifically in suburban locations, can create poor neighbourly relations and cause harm to neighbouring amenity.
- 3.3.14 Where buildings meet the definition of a tall building as set out in Policy D9A of the London Plan (2021), applicants must demonstrate compliance with the considerations set out within Policy D9C of the London Plan (2021).

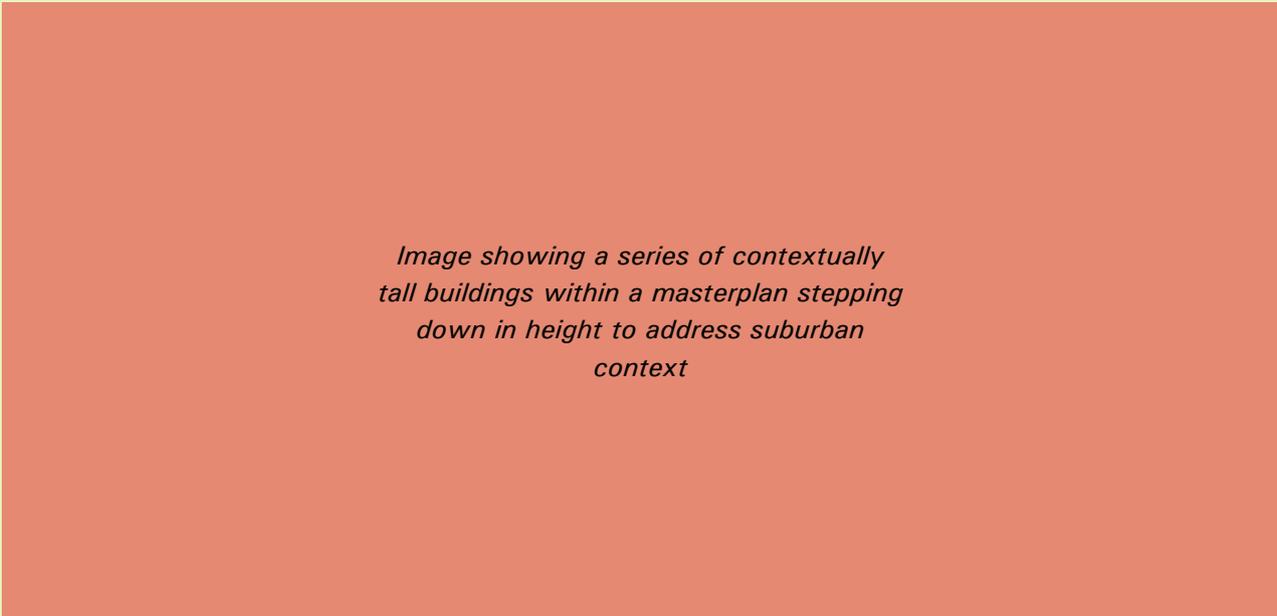


Image showing a series of contextually tall buildings within a masterplan stepping down in height to address suburban context

Image caption

- 3.4.1 Much of Harrow's built heritage can be found in clusters around its medieval town centres such as Pinner and Harrow on the Hill and its stations such as Rayners Lane and Stanmore. Conservation Areas help protect notable areas of 19th and 20th century architecture and Statutory Listed Buildings highlight a range of period buildings including Modernist and Art Deco stations, libraries and cinemas.
- 3.4.2 Landscape and townscape also contribute to the borough's spacious character, with mature parkland and woodland shaping a strong sense of place in areas like Canons Park and Hatch End and protected views to and from St Mary's Church, Harrow on the Hill in the south of the borough.



Image showing heritage landscape or park in Harrow



Image showing a Conservation Area in Harrow

Image caption

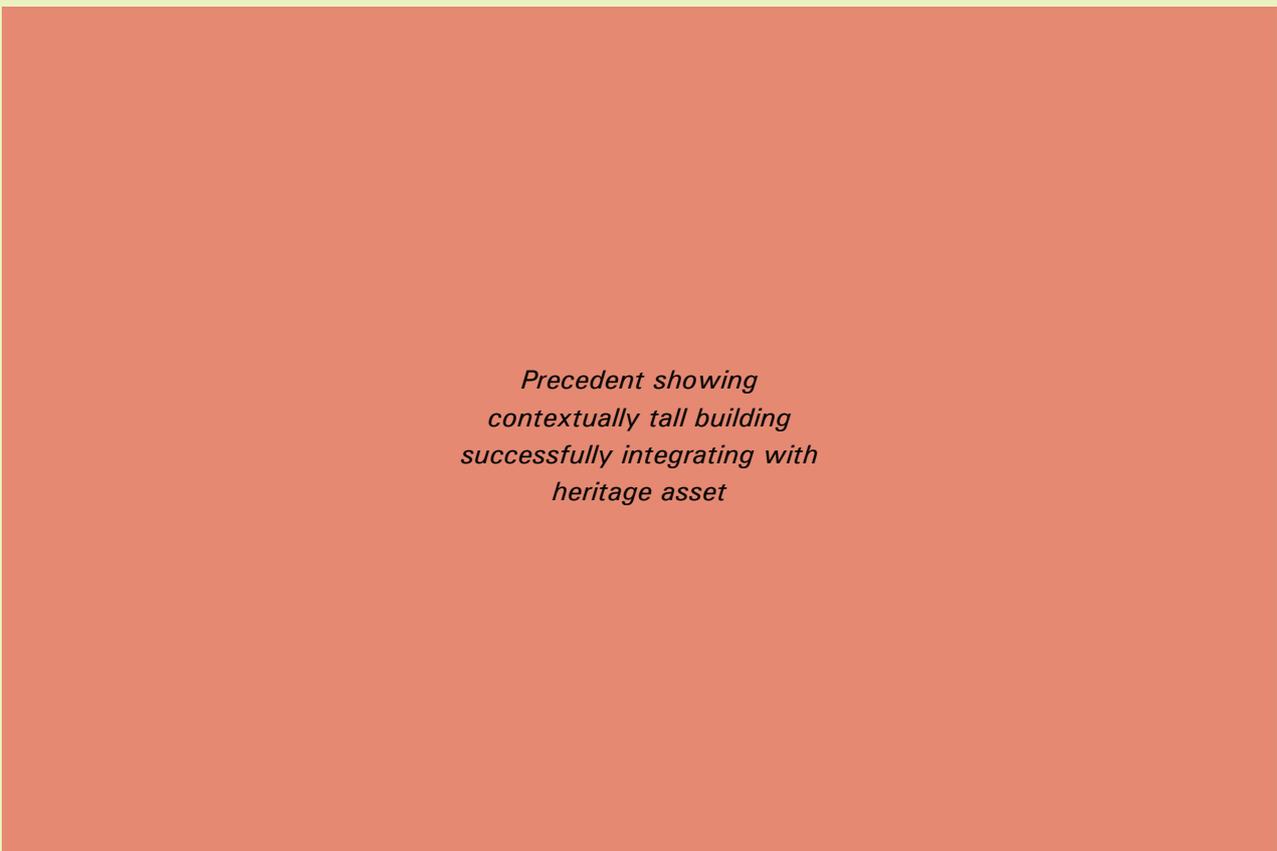


Development responds sensitively to heritage assets

3.4.3 Tall or contextually tall buildings can cause harm to heritage assets and their settings when inappropriately designed. All developments within the setting of a heritage asset must demonstrate consideration against the relevant Conservation Areas SPDs and Management Appraisals. This includes:

- **Conservation Areas**
- **Local Areas of Special Character**
- **Nationally Listed Buildings**
- **Locally Listed Buildings**
- **Scheduled Ancient Monuments**
- **Historic Parks and Gardens**

3.4.4 When tall and contextually tall buildings are located in close proximity to heritage assets, a highly sensitive approach to height, building form and material use must be followed to ensure any new development complements heritage assets and does not detract from their heritage value.



Precedent showing contextually tall building successfully integrating with heritage asset

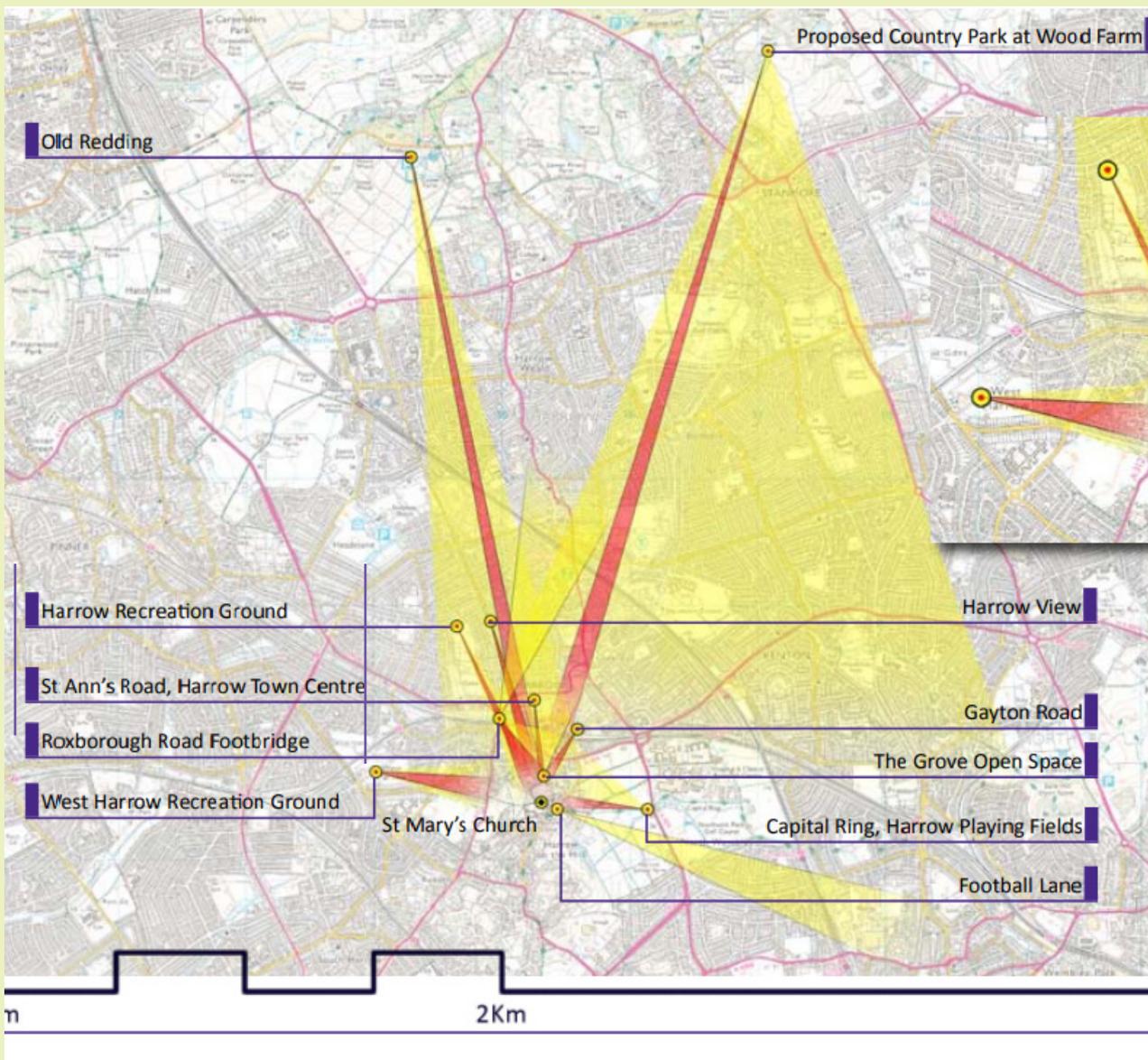
Image caption



Development responds sensitively to protected views

3.4.5 Viewing corridors and associated policy seek to protect views of St Mary’s Church, Harrow on the Hill. Applications must address policy requirements and guidance in Policy DM3 (Protected Views and Vistas). Height envelopes apply to developments within viewing corridors, it does not expressly prohibit height, subject to consideration against the remainder of the development plan.

3.4.6 Proposals that are located within the landmark viewing corridor (shown in red in the Harrow policy maps), should not exceed specified height thresholds. In the event that they do exceed the height thresholds, the development must demonstrate exemplary architecture and enhance the view. Development in the wider setting (shown in yellow in the Harrow policy maps) should form an attractive development.



Harrow’s protected views centre on St. Mary’s, Harrow-on-the-Hill which the metropolitan centre sitting to the north of this important heritage site.



Development preserves Harrow's historic landscapes and open space

- 3.4.7 Harrow has a verdant character with a rich network of open spaces, reflecting its location at the upper reaches of the London basin. There is a general rise in levels in from south to north, with a number of notable topographical features across the borough.
- 3.4.8 Buildings located adjacent to publicly accessible open space (regardless of its

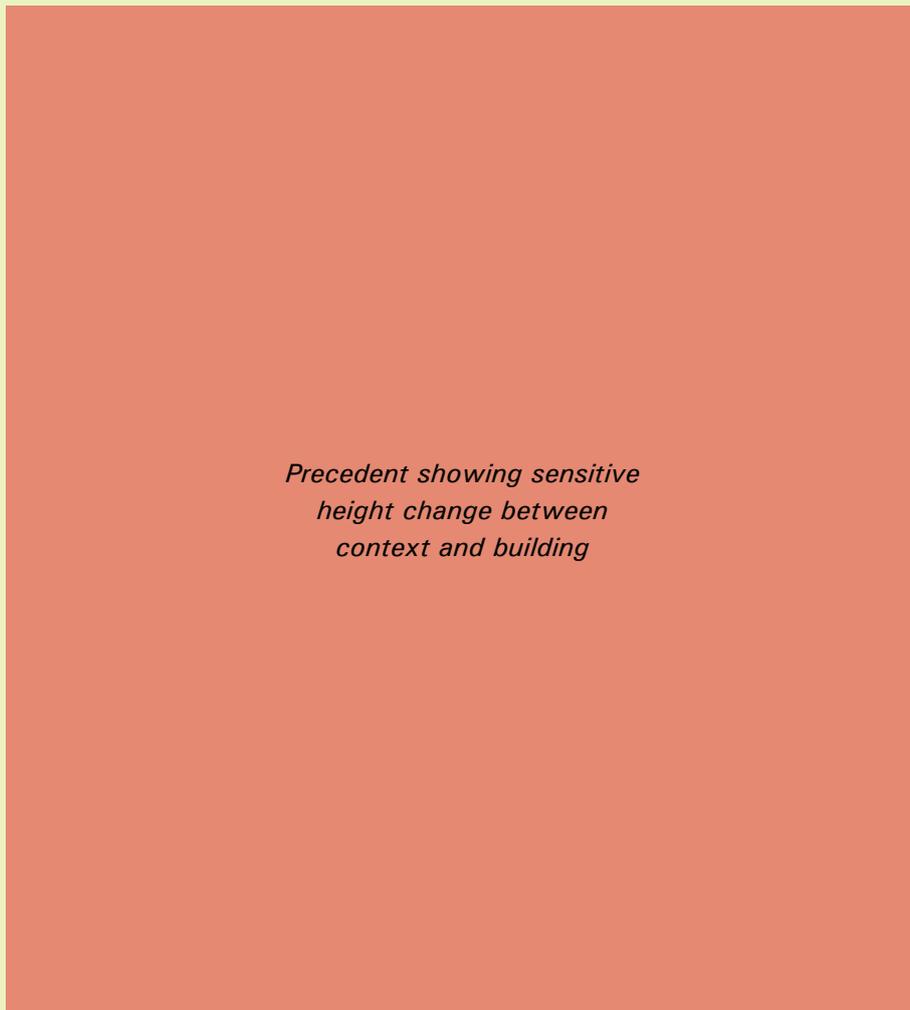
designation) can have a detrimental impact on the quality and use of that space by local people.

- 3.4.9 As such, new development should not impede local street or parkland views and vistas, and should protect the open quality and amenity of parks, the Green Belt, Metropolitan Open Land and other Public Open Spaces.



Canons Park is a Grade II listed park and garden in the north-west of the borough. A sense of verdant openness is vital to the richness which this space provides to local residents for recreation, wellbeing leisure uses. Development should not impede or compromise the open quality and amenity of such spaces.

- 3.5.1 Tall and contextually tall buildings should be sited in appropriate locations. Appropriateness relates to the sustainability and suitability of a location. Inappropriately located tall and contextually tall buildings can cause harm to built character and to the people who live, work in or visit an area.
- 3.5.2 Applicants must consider the following factors when assessing the appropriateness of a tall or contextually tall building.



Precedent showing sensitive height change between context and building

Image Caption



Sustainable locations

3.5.3 Tall and contextually tall buildings should principally be located close to social, commercial and transport infrastructure (such as shops, public spaces and public transport links). Concentrating development in such locations makes best use of existing service and infrastructure networks and reduces pressures on other areas. Elements of sustainable locations include a proximity to:

- **Town or local centres**
- **Public open space**
- **Bicycle routes**
- **Public transport routes**
- **Railway stations**
- **Movement corridors**

3.5.4 Much of the suburban context within Harrow is not in proximity to the above elements and therefore tall and contextually tall buildings are unlikely to be considered appropriate within suburban Harrow.



Image showing a contextually tall building in a sustainable location such as a town centre

Image caption



Prominence and townscape impact

3.5.5 Buildings that are tall or contextually tall have the potential to cause harm due to being overly prominent. Applicants must assess the townscape impacts of height and massing by identifying key short, medium and long range views.

3.5.6 Applicants can assess such impact through a Townscape and Visual Impact Assessment (TVIA), which 3D models proposals in their context using:

- **Zones of Theoretical Visibility Testing (ZTV)**
- **Accurate Visual Representations (AVR)**
- **Verified views analysis**



Wayfinding and legibility

3.5.7 New developments that are tall or contextually tall must justify why proposals of lower heights are unable to be progressed.

3.5.8 Where proposals exceed the prevailing height of a given context, clear townscape merit for this additional height must be demonstrated.

3.5.9 Tall or contextually tall buildings should

reinforce and improve the legibility of the street pattern for pedestrians.

3.5.10 In appropriate locations, elements of height can strengthen the identity and focal points of areas and centres, however, taller buildings should not seek to identify themselves through height alone as wayfinding can be achieved through material use and signage.



Image showing defined frontage within street scene of a contextually tall building

Image caption



Orientation and neighbouring sites

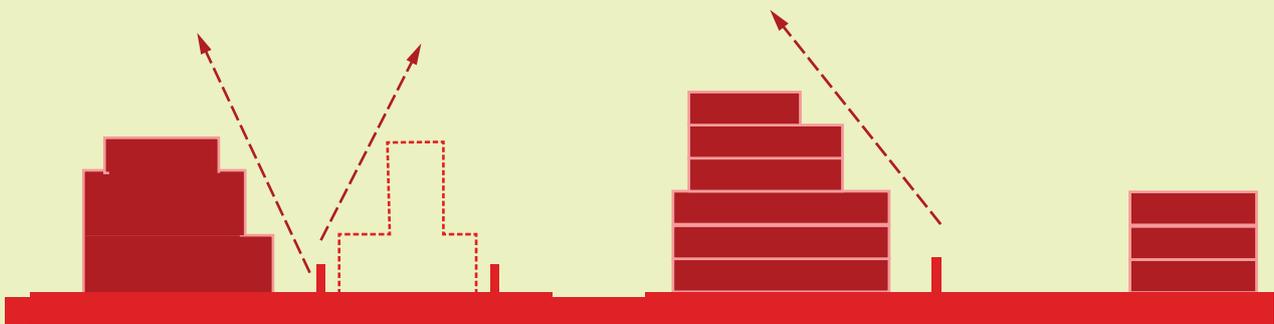
3.5.11 A building that is tall or contextually tall, has the potential to cause harm to adjoining properties due to poor siting of massing and window openings.

3.5.12 Height and massing must be located with regard to the proximity and outlook of neighbouring buildings, minimising harm through loss of light, outlook and overbearing.

3.5.13 Applicants can mitigate against these impacts through the orientation of elements of height

within a site, by offsetting from boundary lines and by stepping back massing of taller elements.

3.5.14 Orientating outlook and aspect away from neighbouring sites can ensure that harm through actual and perceived overlooking or a loss of privacy is minimised. Doing so can also reduce the likelihood of adjoining sites being prejudiced from future development and can contribute to active frontages of street scenes.



Massing is positioned on site so as not to prejudice development on neighbouring sites by setting back from shared boundary lines and tapering massing to allow for greater daylight and sunlight.

Height is positioned to respect views from habitable room windows of neighbouring buildings and massing is stepped back from boundary lines to reduce overbearing.

- 3.6.1 Architecture encompasses not only the external design of buildings, but how they integrate with their immediate settings, including public realm and outdoor spaces. It also extends to the internal design and layout of buildings, including private and communal spaces and the configuration and spatial qualities of private spaces. High quality architecture is essential in adding richness to the borough through external design, elevations and material use, and also in providing quality spaces for people to live and work.
- 3.6.2 Tall or contextually tall buildings which exhibit poor architecture can exacerbate harm caused to an area's character and can negatively impact the perceptions and experience of that area. Conversely, well-resolved and rich architecture can add to the vitality of the borough's built environment and contribute to a rich and varied townscape.



Image showing Harrow development with rich material detailing

Image caption

3.7.1 The human impacts of tall and contextually tall buildings can be felt by those who live and work in them, as well as those who live in their vicinity or who simply walk past them. Tall and contextually tall buildings should be designed to contribute to the lived experience of all users. By creating buildings which contribute to liveable places, increased density can be delivered in tandem with improvements to local people's quality of life.



*Image showing successful
shared amenity space in
Harrow development*

Image caption



Human scale at ground floor level

3.7.2 Tall buildings can appear imposing to pedestrians and the design of the ground floor element is critical in ensuring that tall buildings integrate with ground floor pedestrian uses.

3.7.3 Ground floor frontages and entrance features should not be overly dominant or overbearing and should respond to ground floor massing within the wider context where appropriate. For example, a setback above

ground floor level can assist in creating a more approachable ground floor volume for pedestrians and reducing the dominance and overbearing quality of tall and contextually tall buildings in the street scene.

3.7.4 Principle E1 provides guidance on the design of the base and ground floor of a tall or contextually tall building.



Image showing sensitive ground floor scale and public realm treatment

Image caption



Overbearing and overlooking

3.7.5 Proposals for tall or contextually tall buildings must ensure that the amenity of adjacent internal and outdoor spaces are not compromised due to overlooking and overshadowing.

3.7.6 As part of any character analysis, especially in suburban areas, care must be taken to ensure that the massing of tall or contextually tall buildings does not result in actual overbearing or perceived overbearing on adjoining sites. Overbearing can be addressed through reductions in height or by locating massing away from neighbouring sites.

3.7.7 Tall or contextually tall buildings can negatively impact neighbouring residential amenity through actual and perceived overlooking. The fenestration and amount of window openings, private balconies or elevated communal amenity spaces can cause significant harm to the privacy of neighbouring residents and users. These features must be sensitively arranged to ensure that overlooking is minimised.

3.7.8 Proposals which fail to satisfactorily address overbearing and overlooking concerns will not be supported. Refer to guidance set out in C4 to assist with measures to address matters relating to overbearing and overlooking.



Image showing poor example of multiple window openings with no reveals facing neighbouring site

Image caption



Public realm

3.7.9 To achieve a well-integrated development, tall and contextually tall buildings must demonstrate a successful public realm strategy which recognises and integrates with the surrounding built grain.

3.7.10 Proposals must demonstrate a high quality public realm strategy which:

1. **Allows for and improves connectivity with the wider area**
2. **Creates pedestrian permeability through the site**
3. **Provides a clear hierarchy for pedestrian, cycle, vehicle and servicing users**
4. **Is accessible for all ages and physical abilities**

5. **Supports biodiversity and sustainability through planting and natural, permeable and durable materials.**

6. **Improves the wider area and neighbourhood amenity through quality material use, street furniture and incidental play where necessary.**

7. **Provides opportunities for the integration of public art should be investigated at early design stage.**

3.7.11 The Design and Access statement must be supported by a robust, illustrated landscape strategy including management and maintenance proposals to ensure that the development is established and maintained in accordance with the above design objectives.



Image showing quality public realm and play space in Harrow development



Image showing quality public realm and play space in Harrow development

Image caption



Residential amenity

- 3.7.12 Tall and contextually tall buildings can deliver a large number of homes, leading to many people occupying one site. Whilst height can be appropriate in some locations, and can ensure an effective use of a site, this must not be to the detriment of future occupiers amenity.
- 3.7.13 All schemes must meet nationally described minimum space standards for new dwellings. Dual aspect homes should be sought for all homes to ensure future occupiers benefit from a satisfactory outlook and level of natural light and ability to passively ventilate homes. North-facing single aspect units will not be supported.
- 3.7.14 Where height is proposed, access to meaningful amenity space is fundamental. As a minimum, all homes should provide enough private amenity space to comply with the London Plan (2021). Private amenity space must preserve resident privacy and attention should be paid to balustrade treatment. At higher levels, inset balconies can assist in reducing excessive wind to such spaces while creating a greater sense of enclosure.
- 3.7.15 Communal amenity space such as gardens or courtyards should be considered at an early design stage. Communal amenity space should be useable, functional and identifiably open for all occupiers. Flat roof space can be used as communal amenity space in circumstances where there is minimal actual and perceived overlooking. Scrutiny will be placed on user safety measures for such spaces.
- 3.7.16 Schemes with family-sized homes must ensure children's play space is provided in accordance with London Plan requirements of 10sqm per child. Play space must provide for a range of ages and have good access to natural light and passive surveillance. Level access should be provided with a range of play equipment to ensure an accessible offer. All play space must be tenure blind and freely accessible to all children living in the development. Applicants should ensure that play spaces can be easily accessed from family-sized homes.
- 3.7.17 Fenestration design should ensure adequate levels of sunlight and daylight are received into all new homes, whilst protecting the privacy of future occupiers and existing residents. Harrow Planning Applications Requirements indicates that a statement should be provided with any building that exceeds four storeys in height where adjoining other developed land or public open spaces. Developments requiring such a statement must demonstrate compliance with the relevant BRE Standards.
- 3.7.18 Where mixed-use developments are proposed, a clear separation of uses must be provided, with a separate access for each use and clear legibility of uses in the streetscene. Separate servicing arrangements will be required and should not compromise residential amenity.



Image showing good precedent of shared amenity space



Image showing good precedent of private amenity spaces



Image showing good precedent of play space within landscape strategy

Image caption

Image caption



Transport and parking

3.7.19 Higher occupancy levels for tall and contextually tall buildings may place increased demand on transport infrastructure. Developments that result in a higher yield of activity should be located in areas with good access to public transport links. Locating developments in such locations will reduce reliance on private motor vehicles.

3.7.20 The quantum of car parking required, including any disabled parking, electric vehicle charging spaces and motorcycle and cycle spaces is set out in the London Plan (2021).

3.7.21 Proposals should ensure dedicated servicing bays are provided to meet the requirements of the site and future occupants. This includes online shopping and grocery deliveries as well as the delivery of larger bulky items. An assessment of the servicing requirements for a development must be undertaken to determine the number of servicing bays required. Dedicated servicing bays should be provided

off the highway where possible and meet Highways Authority requirements.

3.7.22 Where a basement, undercroft parking or service yard are proposed, these shall not prejudice pedestrian safety. Controlled access to these elements of a development should be provided to prevent unauthorised access and antisocial behaviour, particular during nighttime hours.

3.7.23 Cycle parking and cycle stores must be easily accessible to residents and users and should typically be accessed from within the main entrance core for convenience. Stores should not exceed space for 70 cycles per enclosure, with multiple enclosures provided for larger stores to provide resilience against cycle theft.

3.7.24 Cycle stores which are directly accessed from the street are unlikely to be supported as such stores have a higher risk of trespassing and are less convenient for users.



Image showing high quality cycle store and lobby

Image caption



Servicing and waste collection

- 3.7.25 Tall and contextually tall buildings can struggle to deliver the required space for satisfactory provision of waste infrastructure. This is relevant for both new builds and retrofitting of existing building seeking upward extensions.
- 3.7.26 Mixed-use schemes must demonstrate separate waste provision for residential and non-residential waste, at a scale appropriate for each quantum of use proposed.
- 3.7.27 Refuse collection must provide inclusive access for all in accordance with current legislation and be located in intuitive locations for ease of use. Drag distance for waste operators must be in accordance with the London Borough of Harrow Code of Practice for Waste & Recycling Strategy.
- 3.7.28 Refuse store locations should not compromise the ability to provide an active frontage and should not typically be located on main roads or busy routes.
- 3.7.29 Further to the above guidance, applicants should also refer to the London Borough of Harrow Code of Practice for Waste & Recycling Strategy.
- 3.7.30 Electric and gas meters should be sensitively placed to ensure these are not visible within the streetscene.
- 3.7.31 Postal theft is a widespread issue across London. As such, developments should provide an integrated solution for delivery lockers and postal boxes.



Designing out crime

- 3.7.32 Tall and contextually tall buildings should clearly delineate public and private space. The security and management strategy for communal areas should be outlined to ensure the operational use of building follows policy and best practice guidance. Well-defined prevention, evacuation and response strategies will minimise threats from fire, flooding, terrorism, and other situational hazards. If terror protection is considered relevant, the use of bollards, planters or low walls along the perimeter are preferable to taller fences.
- 3.7.33 To achieve a high-quality design and ensure that the requirements of crime prevention through that design is achieved successfully, consultation with the Metropolitan Police (Secured by Design) is encouraged.



Solar gain

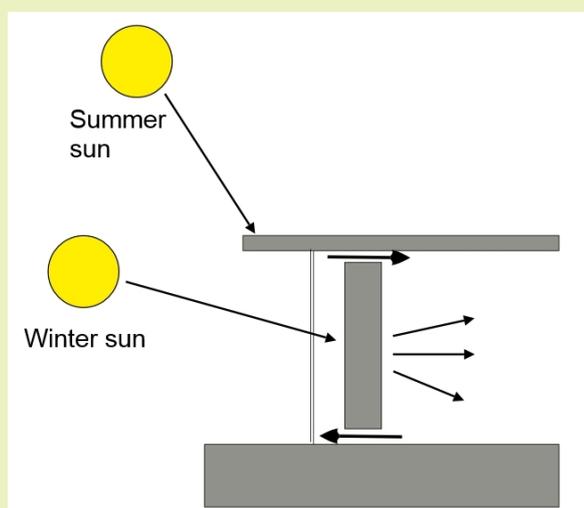
3.7.34 Large amounts of glazing can lead to increasing levels of heat loss in winter and solar gain in summer - both of which result in additional energy consumption and poor thermal comfort. Glazing levels should seek to limit space heating demand and peak solar gain while ensuring good daylight levels.

3.7.35 Glazing strategies should address south-facing aspects and mitigate where needed, such as by using deeper window reveals, inset balconies to provide greater shading or by reducing the size of window openings.



Image showing facade of development in Harrow with deep reveals

Image caption





Daylight and overshadowing

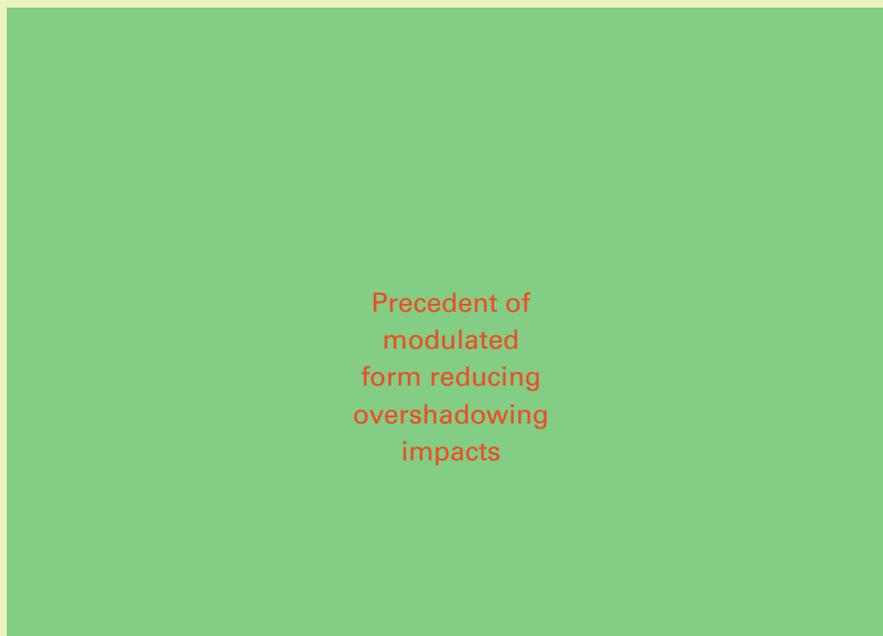
3.7.36 Tall and contextually tall buildings can significantly reduce the amount of daylight and sunlight to neighbouring sites due to their massing. This includes to neighbouring buildings, amenity spaces and public open spaces.

3.7.37 By modulating built form and/or locating elements of height away from neighbours developments, loss of light impacts can be minimised.

3.7.38 In certain site circumstances mitigation may be difficult to achieve. In such cases, applications must be supported by a Daylight and Sunlight

Assessment produced by a suitably qualified professional to demonstrate satisfactory daylight and sunlight levels both for the development and for buildings and spaces surrounding the development. Developments must demonstrate that adequate daylight and sunlight levels can be provided for all future occupiers.

3.7.39 Developments that exceed four storeys (including upward extensions to existing buildings) must be accompanied by a Daylight and Sunlight Assessment. This must be prepared in accordance with the relevant BRE guidance.





Air, noise and microclimate

3.7.40 Air movement and quality: Harrow is designated as an Air Quality Management Area, and tall buildings can have an impact on both the movement of air through an area, and on the quality of the air due to the dispersal of pollutants.

3.7.41 Major applications must be supported with appropriate modelling of the building envelope and its effect on air movement. Consideration of building massing and façade orientation which encourages the effective dispersion of pollutants and avoids adversely affecting street level conditions is required.

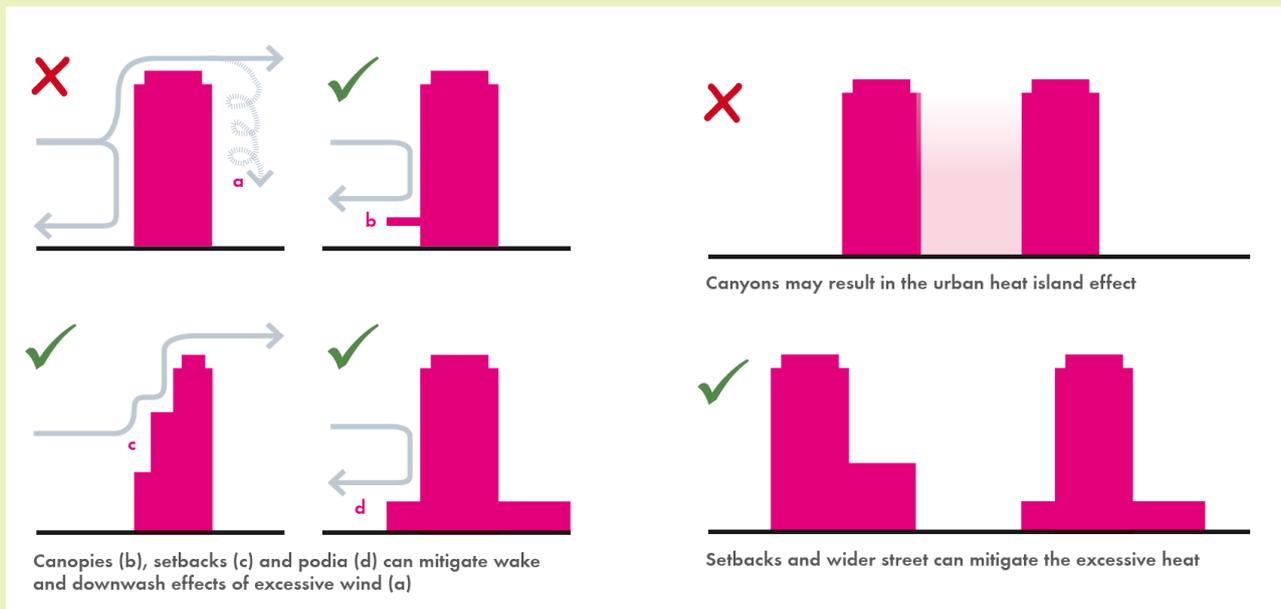
3.7.42 A comprehensive Air Movement and Quality Statement should be provided as part of any proposal, to avoid retrofitting of design features that may compromise air movement or quality in the area.

3.7.43 Noise: Proposals should consider the potential noise levels created by air movement, building use or operational machinery to maximise the enjoyment of internal and open spaces in and around a building.

3.7.44 The impacts of noise to homes from noise-emitting sources such as industrial sites or major thoroughfares should be fully mitigated against. In the first instance, buildings should be sited away from such sources and habitable rooms should face away. Winter gardens and triple glazing can also assist in reducing noise to homes in certain circumstances.

3.7.45 Microclimate: Proposal should provide analyses of the macro- and micro-scale climatic conditions for a site at the earliest possible stage of the design process to ensure that a scheme can mitigate risks caused by wind and other climatic forces on a building and its wider context. Tall buildings should provide microclimate analysis for any public or private amenity space, such as squares, balconies or roof terraces, to ensure that such spaces are usable and comfortable.

3.7.46 Conducting an early-stage analysis can ensure that design solutions can be implemented and integrated within a building from the outset, reducing the risk of unsightly or expensive remedial measures post-occupancy.





Greening

- 3.7.47 Developments should introduce meaningful and durable soft landscaping, tree-planting and sustainable urban drainage measures which enhance the natural character of the site whilst providing essential urban greening. Successful green space on a site can provide many benefits to a scheme and its wider context. These include softening the appearance of a development, increasing biodiversity, reducing the urban heat island affect and wellbeing benefits.
- 3.7.48 Designs should consider how a landscape strategy can address multiple aims for a development, such as amenity and play space and biodiversity net gain. Landscaping should be an integral part of the concept design stage
- and landscape-led masterplans are encouraged for larger sites.
- 3.7.49 Roofscapes can contribute to increased greening of a development and can be jointly occupied with solar technology and planting (known as a biosolar roof).
- 3.7.50 Major applications must meet Urban Greening Factor requirements as set out in Policy G5 (Urban Greening) of the London Plan (2021).
- 3.7.51 Urban Greening is an important component in addressing the urban heat island effect, which is caused by extensive hardscaped, built-up areas absorbing and retaining heat and increasing the local ambient temperature.



An example of a biosolar roof. Greening and solar panel provision for heating and hot water can be co-located on roofspace.

Poor use of roof space can contribute to urban heat island effects and limit the amount of communal amenity space. By rationalising rooftop plant and sensitively optimising roof space, greening can become an integral part of environmental and amenity strategies.

3.8.1 Harrow has a wealth of unique and characterful architectural assets, from modest but well-proportioned interwar parades to Modernist detached houses and Art Deco mansion blocks. The next generation of development in the borough should respond with equally high-quality external design.

3.8.2 New development which is architecturally referential to its context and makes rich use of material and form can assist in developing a contemporary architectural language which is uniquely Harrow-centred.

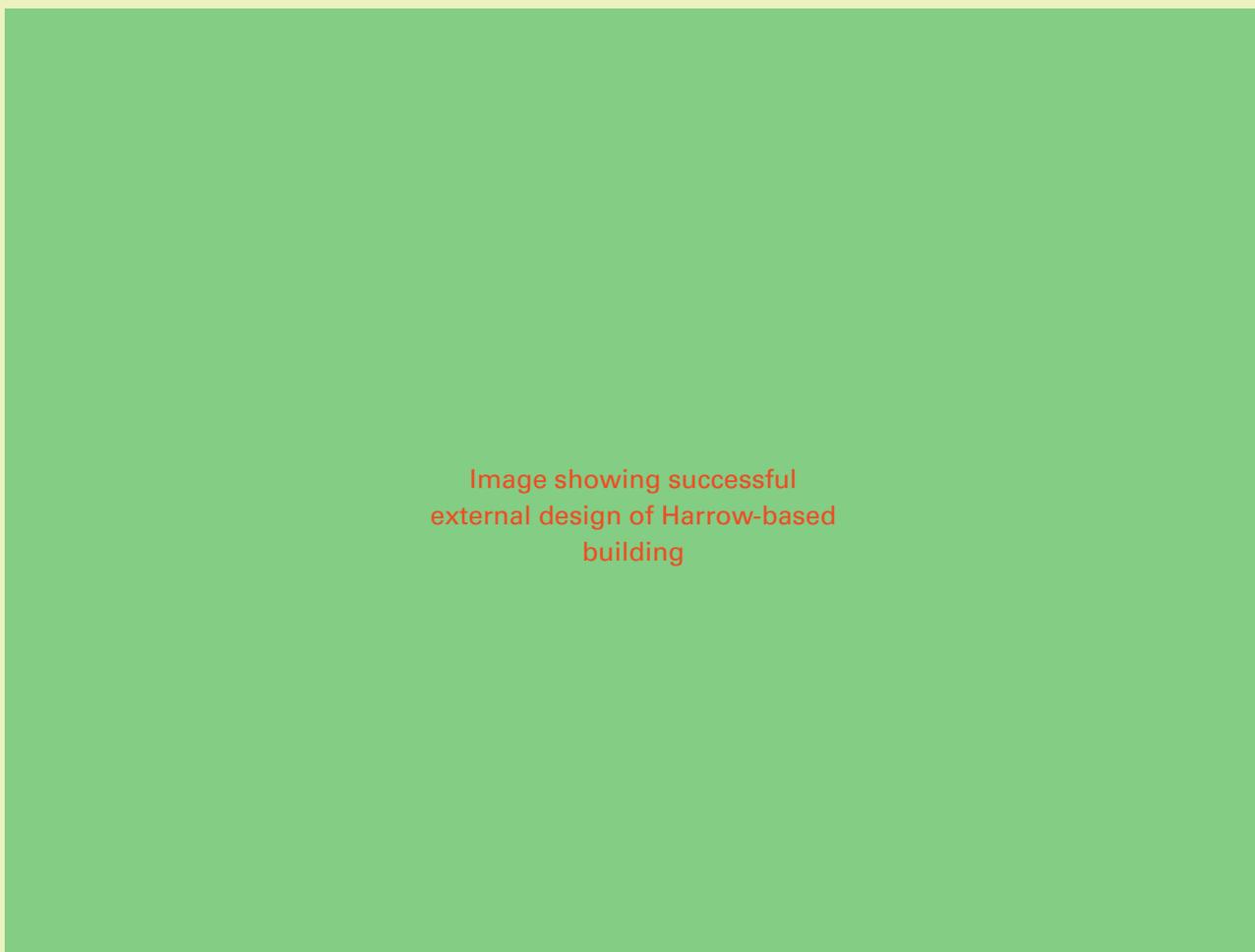


Image showing successful external design of Harrow-based building

Image caption



Form and composition

3.8.3 Tall buildings are typically comprised of three distinct elements: the top, middle and base. The treatment of these individual elements assists in the overall successful external design of a building. The scrutiny of these elements are more important the taller a building is, as the harm caused by poorly designed elements is exacerbated due to the increased prominence of a building.

3.8.4 By modulating the building massing to express the base and top of a building, the visual prominence of proposals can be reduced. An expressed base with a setback middle can better integrate into existing street scenes and provide a more approachable and human-scale entrance to buildings.

Image caption



Image showing top of Harrow-based building



Image showing base of Harrow-based building

Top

- 3.8.5 The building top provides opportunities for new inflection points in the skyline and their shape and impact should be well-considered. This element needs to be articulated as buildings which lack an expressed top can appear incomplete.
- 3.8.6 Rooftop plant should not be visible and should be appropriately concealed as part of the architectural design.
- 3.8.7 The approach to the building top should depend on the role and position of the tall building within its wider context.
- 3.8.8 It is preferable that the uppermost floors (which also form part of the top) should be articulated and distinct in material and form to the middle.

Middle

- 3.8.9 The middle section comprises the main building volume. Its three-dimensional form will directly affect the microclimate so the design should consider the impact on wind flow, ambient heat, privacy, light and overshadowing.
- 3.8.10 The building envelope should balance exhibiting the internal function of a building with an external appearance which integrates with surrounding buildings, streets and spaces.

Base

- 3.8.11 The base is where tall buildings meet the ground and heavily impacts the street experience for pedestrians. Good base design can create vibrant and visible uses to the ground floor and rich and welcoming entrances to buildings, whilst integrating into their wider built setting.
- 3.8.12 There are typically two approaches to a base: buildings which sit on a podium base and those which are expressed as part of a continuous volume. The type of base appropriate for a proposal should stem from a context-based analysis.
- 3.8.13 While the base design approach should be contextually driven, it is important to note that ground floor spaces must typically accommodate a wide range of functions including servicing and back of house uses. These should be sufficiently sized without compromising front of house and active ground floor uses.

Mediating massing

- 3.8.14 Mediating or shoulder massing can be used on larger sites to modulate the overall composition of massing by providing a stepped or graded transition between significantly taller elements and the lower scale of existing buildings. This can assist in creating a gradual increase in scale, reducing the contrast between elements of low-rise and tall height.



Image showing development with shoulder massing

Image caption



Elevation treatment

3.8.15 It is essential that developments feature a well-resolved series of elevations, regardless of the prominence of these elevations. As the most visible feature of buildings, successfully articulated elevation design can add richness to townscapes. Five key components to successful elevation design include:

Visual interest

3.8.16 Visual interest and texture can be provided through rich material use, well-resolved details and feature panels to break up overly blank or inactive areas of elevation.

Layering

3.8.17 Richness can be created by breaking single elevations into elements and assembling these to create harmonious compositions. Layered elements could differ by material or setback.

Harmonious fenestration

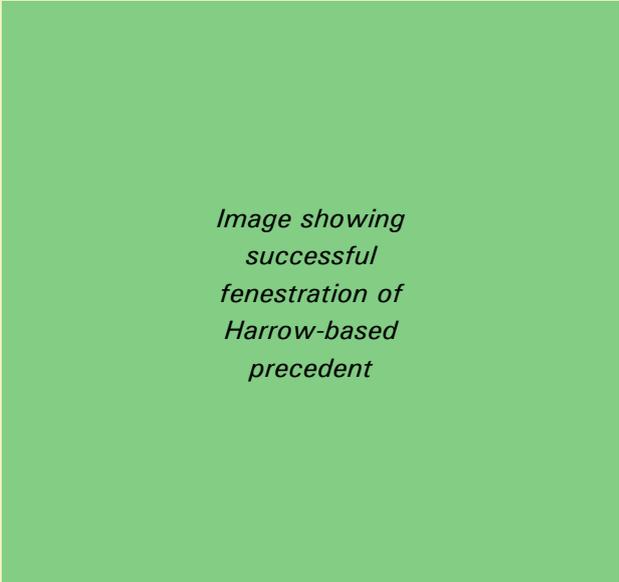
3.8.18 Facade compositions feature defined window opening with at least a 20cm deep reveal. Window alignment and modulation of elements such as balconies and recesses should be arranged to create a cohesive and attractive elevation.

Relationship to internal uses

3.8.19 Where possible, elevation and facade treatments should respond to and express internal functions and uses.

Evolving existing typologies

3.8.20 Where appropriate, elevations should relate to prevailing architectural forms and features in their context.



*Image showing
successful
fenestration of
Harrow-based
precedent*

Image caption



*Image showing
successful
elevation rhythm
of Harrow-based
precedent*

Image caption



Materials and detailing

- 3.8.21 The use of high-quality can add value to the character of areas and set aspirations for future development. Proposals will be expected to make use of durable and rich external materials.
- 3.8.22 Material use is a significant contributor to the carbon footprint of developments and measures to reduce the embodied carbon of production and transport, such as by specifying natural and UK- or EU-sourced materials is strongly encouraged.
- 3.8.23 Maintaining external materials and elevations can be challenging for tall buildings given their height. A maintenance strategy for all elevations is expected to be provided to ensure that materials can be and refurbished and replaced if necessary. Precedents should show that weathering progresses in an attractive manner.
- 3.8.24 External materials can be used to relate new development to existing buildings in an area. An assessment of contextual material palettes and architectural features should be conducted as part of any application (Chapter 2.1), as this may allow for material and detailing references to become part of the design proposal.
- 3.8.25 High-quality detailing creates a quality external appearance. Simple but well-resolved measures around thresholds, reveals and junctions can contribute to the overall quality and visual interest of a development. Imaginative detailing can also be used to create feature elements of buildings, such as around entrances, to soffits and balconies and to structural elements like columns.
- 3.8.26 Additionally, considered and thorough detailing can result in an improved build quality and reduced maintenance.



Image showing good practice natural material use

Image caption



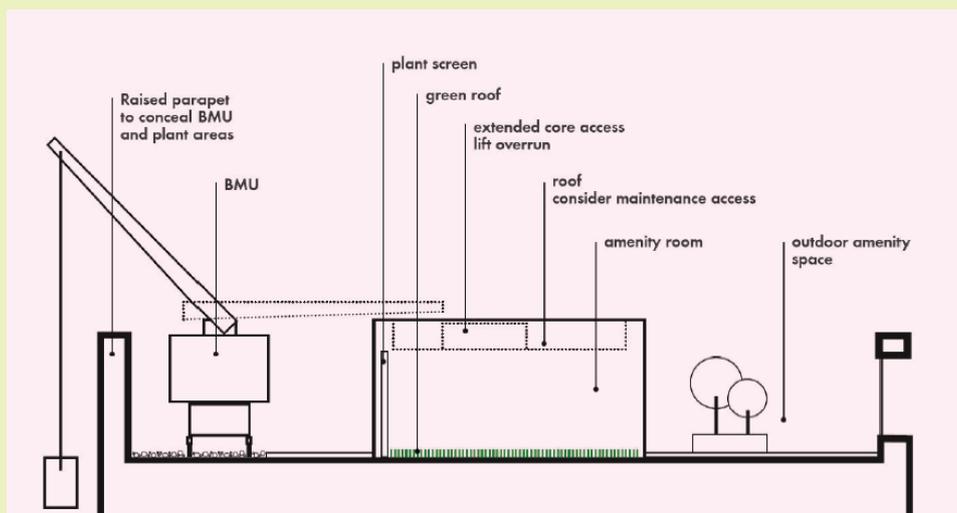
Image showing poor practice low-quality material with staining and exposed fixings

Image caption



Roofscapes

- 3.8.27 Roofscape design should be considered early in the design process as roofscape functions can have a significant impact on the appearance of a building and can contribute to wider policy objectives such as the Urban Greening Factor.
- 3.8.28 Roofscapes serve as a termination to tall and contextually tall buildings and are often the first visible element of a building. As such, roofscapes have a considerable impact on the character of areas and the character of buildings themselves. Proposals should differentiate roofscapes through form, materiality, detailing or a combination of these. The design of roofscapes should not however, exacerbate overbearing impacts.
- 3.8.29 Successful roof design should ensure that roof space is utilised efficiently to avoid dead space.
- 3.8.30 Solar technology and urban greening are two appropriate uses for roofs, and can add planning benefit to a scheme. Developments with roofscapes that are inefficiently used will not be supported unless clear design rationale is provided, such as for pitched roofs.
- 3.8.31 Ancillary plant equipment, window cleaning hoists and aerials must be consolidated and screened to ensure no unsightly additions detract from the roofscape.



This roof section indicates the variety of rooftop components and uses which must be screened



Active ground floor frontage

- 3.8.32 Active ground floor frontages can serve two functions: providing both a practical uses for the building, such as communal entrances, commercial spaces and cycle stores but also a relationship to the street, helping pedestrians feel safer and contributing to the vitality of town centres.
- 3.8.33 Tall and contextually tall buildings in suitable locations should incorporate non-residential or communal ground floor uses to create activity and interest for pedestrians. Services, shops and community uses are often suitable for ground floor use and should be pursued where appropriate.

3.9.1 All developments should constitute sustainable development, particularly in response to the climate emergency. The London Plan (2021) requires major applications to achieve zero-carbon firstly through on-site measures, and where not achievable on site, financial contributions to offset reductions offsite. Early consideration of sustainable design technologies and solutions should be factored into proposals for tall and contextually tall buildings. Construction methods should look to reuse materials and also reduce the amount of waste from the construction process.



Sustainable construction

3.9.2 All development must use sustainable construction methods to assist in reducing their carbon footprint and waste through circular economy principles. Developments which use sustainable methods of construction are highly encouraged.

3.9.3 Applicants should explore the use of low-carbon or zero-carbon structural systems and

reduce reinforced concrete construction where possible and practicable.

3.9.4 Buildings should be designed for disassembly and a clear strategy for material reuse and recycling is expected to be included within Design and Access Statements.

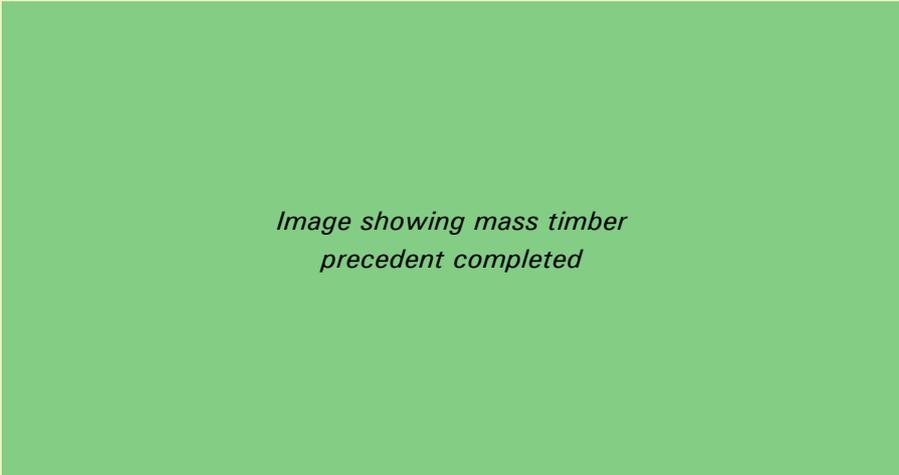


Image caption



Passive design

- 3.9.5 Tall and contextually tall building proposals are encouraged to adopt Passivhaus design principles to ensure that a fabric-first approach is maximised.
- 3.9.6 Junctions and thermal bridging must be minimised and a high overall U-value achieved. Air tightness, insulation and triple glazing can all ensure that a fabric-first approach is

achieved, reducing demand on heating and cooling.

- 3.9.7 Proposals should ensure that key junctions in the building envelope such as wall to floor connections, window head/sill/jamb and balcony connections are of a high standard and are airtight to ensure minimal thermal loss.



Image showing Passivhaus-accredited tall building

Image caption



Low embodied carbon materials

- 3.9.8 Proposals should seek to utilise, where feasible, low carbon materials to assist in reducing their carbon footprint. Materials that have been developed through the use of by-product or those that have been manufactured from recycled materials will be encouraged to be utilised where appropriate.

- 3.9.9 Redevelopment of sites that require demolition of existing structures, should seek to re-use the materials on site where applicable.

Design Principle F4



Sustainable heating

3.9.10 Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.

3.9.11 Major applications should seek to deliver communal heat systems for developments, and should follow the selected in accordance

with Policy SI 3 (Energy Infrastructure) of the London Plan (2021). Air source heat pumps are supported in most circumstances, and developments will be expected to follow latest guidance on the most appropriate technology to address this.

3.9.12 Proposals should demonstrate the provision to connect to any future heat network systems.

Design Principle F5



Sustainable energy

3.9.13 Proposals should incorporate sustainable low or zero carbon forms of energy generation. Technologies that generate local clean, low-carbon and renewable energy should be applied where feasible. Justification should be provided to demonstrate where such technologies are not feasible or practical.

3.9.14 Proposals should demonstrate the provision to connect to any future district heat network systems.

Design Principle F6



Biodiversity

3.9.15 Tall and contextually tall buildings can impact biodiversity through the loss of habitat, the introduction of excessive light at night or prolonged shading during the day. Such impacts are more keenly felt when adjacent to open spaces, regardless of any statutory designation.

3.9.16 Proposals will be expected to provide biodiversity net gain. Design solutions include habitat or nesting space and biodiverse roofs, as well as other measures.

3.9.17 Proposals should enhance and increase biodiversity and reinforce local distinctiveness through landscape character and planting mixes.

3.9.18 Opportunities to de-culvert streams and include blue infrastructure where applicable to sites will be supported.

3.9.19 Proposals that are detrimental to locally important biodiversity will be resisted.

3.10.1 Good growth is socially and economically inclusive and environmentally sustainable. This principle underpins each of the policies within the London Plan (2021).

3.10.2 Good Growth is based on the following six objectives:

- **Building strong and inclusive communities**
- **Making the best use of land**
- **Creating a healthy city**
- **Delivering the homes Londoners need**
- **Growing a good economy**
- **Increasing efficiency and resilience**

3.10.3 Planning for good growth seeks to ensure that the full range of planning issues are considered when setting out a strategy for growth and development. Good growth seeks to ensure that developments are appropriately located and provide for all in the community, in terms of providing the required number and type of homes, places to work, recreate and socialise. For tall buildings, these should represent buildings of high quality design, in sustainable locations, that contribute to the functioning of the location and residents who are present within its location.

3.10.4 All development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising does not mean maximising and efficient land use must also be sensitive to context and provide betterment to an area, whilst housing all required amenities, such as play space. Whilst ensuring efficient use of land, maintaining an area's prevailing character is equally important. Tall and contextually tall buildings make best use of land in sustainable locations where jobs, infrastructure, and amenities are in close proximity.



Image showing optimised site precedent

Image caption

Design Principle G1



Tall buildings make effective but sensitive use of sites

3.10.5 Proposals should be design-led and ensure that sites are developed optimally. Underutilised sites within their suburban context will not be supported. In optimising site capacity, proposals must deliver on all other relevant policy requirements within the development plan

3.10.6 In making effective but sensitive use of a site, development will need to be considered within its context and whether it seeks to reimagine,

repair or reinforce the character of a particular area. Context will determine how a site should be optimised from a building footprint and height perspective as efficient land use should not result in harm to the character of an area.

3.10.7 Design led proposals should optimise the potential of a site, ensuring that an appropriate level of built development is realised, whilst still ensuring all other policy requirements of the development plan are delivered on site.

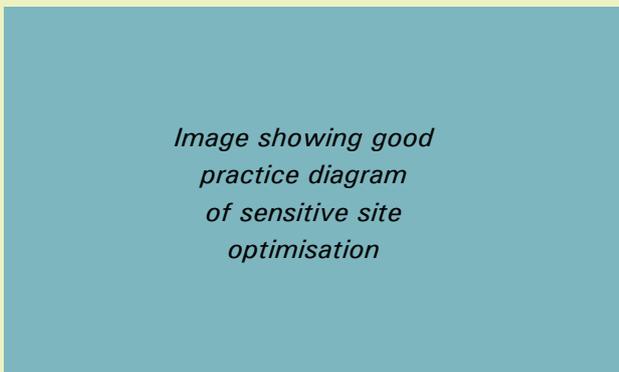


Image showing good practice diagram of sensitive site optimisation

Image caption



Image showing poor practice diagram of site maximisation

3.10.8 Whilst tall buildings and / or contextually tall buildings shall be design-led and relate to the context within which they are located, by reason of the greater capacity of floorspace within a site, they are often able to deliver a higher quantum of housing than a lower density scheme. However, buildings that are tall or contextually tall should be considered exceptional, both in their frequency and design of homes.

Design Principle H1



Tall buildings contribute to Harrow's delivery of high quality new homes

3.10.9 Residential schemes must ensure that homes are of a high quality in terms of design and liveability for future occupiers.

is unable to make more efficient use of a site and deliver the appropriate quantum of housing.

3.10.10 The delivery of housing is likely to remain a key pressure facing local planning authorities, and delivery of homes will continue to hold weight in planning decisions. However, the delivery of housing will not outweigh unacceptable harm caused by a development within the context in which it would be located. Housing may be able to be delivered in a more sensitive manner where height is more contextually appropriate, and applications should demonstrate a design progression to demonstrate that a lower development height

3.10.11 Developments must provide an appropriate mix of homes, to provide housing choice for residents. The delivery of homes should be reflective of the context in which they are located as well as the housing need within the borough.

3.10.12 The design of homes' internal and external spaces must be in accordance with minimum housing standards as mentioned in Design Principle D4.



Tall buildings assist in Harrow's provision of affordable housing

3.10.13 Tall buildings provide an opportunity to deliver more housing per site / development than a lower density scheme. With this comes the opportunity to deliver affordable housing, for which there is an identified need to deliver within the Borough and across London. Developments that exceed 10 homes (net) will be expected to deliver an affordable housing contribution.

3.10.14 Proposals should seek to deliver a mix of housing, both in terms of tenure and size,

which will assist in providing mixed and balanced communities.

3.10.15 Where schemes propose an affordable housing contribution less than the policy requirement, applications must be supported by a financial viability assessment to support this position. Schemes will be subject to the relevant review mechanisms.



Image showing family housing with a tall building

Image caption

3.10.16 In appropriate locations, development should assist in achieving economic growth. Tall Buildings and / or contextually tall buildings , even when residentially led, can provide a mix of uses that can contribute to the vibrancy and vitality of an area. Appropriate non-residential floorspace such as retail, cultural or community uses for example, assist in providing a wider offer of uses for residents within an area, and can contribute to the overall functioning of an area and help to create mixed and balanced communities.

Design Principle I1

Mixed use development

3.10.17 Where opportunities permit, such as suburban town (major, district or local) centres, local or neighbourhood parades, appropriate non-residential uses should be considered. This should initially be provided at ground floor level, however proposals for solely non-residential floorspace in such locations will be supported.

3.10.18 Residential use above employment floorspace can assist in providing mixed and balanced communities, and contributing to the vitality and vibrancy of a suburban town (major, district or local) centre, local or neighbourhood parade.

3.10.19 Mixed use developments must ensure there is no conflict between the differing uses within a

development, ensuring separate access, waste & servicing, cycle storage and appropriate sound proofing is provided.

3.10.20 Non-residential uses in a mixed-use development should have consideration for the needs of future residents and existing residents in the wider area and seek to provide uses which cater to both to ensure social cohesion.

3.10.21 Applications for major applications in suburban town (major, district or local) centres /designated parades should be supported with a vacancy strategy to ensure that in the event than an end user is not available upon completion, the space can be occupied by an appropriate use to ensure the space does not become inactive.

Image of Harrow-based mixed use development

Image caption



Ground floor employment use

- 3.10.22 In appropriate locations such as suburban town centres, local and neighbourhood parades, employment uses should be located on the ground floor. In such locations, an active frontage should be provided to ensure the street scenes remain animated. Blank or inactive frontages will not be supported and can result in buildings and areas appearing overly hostile and unwelcoming.
- 3.10.23 Residential use at the ground floor will not be supported, as this sends a message that the

town centre or parade is in decline and reduces the vitality and viability of future high street uses.

- 3.10.24 Employment uses, specifically in local or neighbourhood centres will be encouraged as these provide the day to day convenience goods and services for suburban localities, whereby reducing the dependence on travel to more major centres for such items, supporting the local economy and encouraging active means of travel.



Social and cultural life

- 3.10.25 Harrow's social and cultural infrastructure is predominately concentrated within the network of centres and movement corridors spread throughout the borough. Such locations are supported by good public transport links. As such, locations such as suburban town (major, district or local) centres, local and neighbourhood parades are sustainable locations, and are ideal locations for future social and cultural uses to be located.
- 3.10.26 Opportunities to provide social and cultural floorspace and uses within tall and contextually

tall buildings, challenge the perceived notion of town centres being a retail and office space location. The provision of social and cultural uses can provide a greater resilience within town centres, local and neighbourhood parades, particularly for the night-time economy, and provide a range of uses which can contribute to the vitality and vibrancy of an area. This is particularly important in ensuring a mix of residents use suburban town centres.



Image of community uses with tall building

Image caption

4.0

Application Process and Requirements

4.1.1 This section sets out the supporting information requirements for applications where tall and / or contextually tall buildings within a suburban context are proposed as part of an application.

4.1.2 All planning applications submitted to the London Borough of Harrow, must provide the relevant information as set out in the Harrow Planning Application Validation Information Requirements (November 2020) or any subsequent versions.

4.1.3 The taller a building is, the greater the potential for harm it can cause to an area. The following information is required to support an application where a tall building is proposed. In the absence of such information, the Local Planning Authority will be unable to fully appraise tall building applications and the level of harm they may cause.

4.1.4 The following are assessments that are specifically required to be submitted where an application proposes buildings of height:

Supporting assessments for tall or contextually tall building proposals

Microclimate assessment

To understand the impacts that a tall building may have on the local environment, including wind, noise, solar glare.

3D Visual Modelling

Modelling must show any proposed tall building within an application site, as well as within the context within which it would sit. This is important to assist in understanding how a proposal would appear within local area and the potential harm it may cause.

Air Quality Assessment

All new development that exceeds four floors in height shall be supported with an Air Quality Statement. This should set out impacts on air quality and how the proposal would seek to mitigate this.

Servicing Strategy

A servicing strategy should provide a statement and plan which successfully demonstrates all aspects of how a development is able to be serviced throughout its life.

Design & Access Statement

Among other elements that a Design & Access Statement should assess and demonstrate, it should undertake an analysis of the prevailing height and context of the area in which the proposal is sought to be located. It should show how the formulae have been applied and if the proposal should be defined as a contextually tall building within its analysis area.

Planning Statement

Specifically to tall buildings, the supporting planning statement shall appraise any development against the guidance objectives and principles set out in this SPD and also the development plan.

Vacancy Strategy

Where proposals include a non-residential element on the ground floor of a scheme, a vacancy strategy should set out how the space will be let in the event that there is no immediate end user.

Daylight & Sunlight Assessment

Should be submitted to support any proposal over more than four storeys in height where adjoining other development land or public open spaces.

Protected Views Assessment

Any development within the protected view corridors as set out in the adopted planning policy maps, must be accompanied by an assessment on how the proposed development would impact on the protected view(s). Assessments should accord with Policy DM3 of the Harrow Development Management Policies Local Plan (2013), or any superseding policy thereafter.

Fire Safety

All development proposals must achieve the highest standards of fire safety. Developments must be supported by a fire safety assessment, and follow the guidance set out within Policy D10 (Fire safety) of the London Plan (2021).

4.2.1 Development where height is proposed, almost always requires planning permission. Furthermore where height is being proposed, they can potentially result in significant harm, and can cause concern to residents by their very nature.

4.2.2 Prior to submission of a planning application, and throughout the planning application statutory timeframe, there are a number of opportunities and avenues for applicants to work with the LPA to reach a successful outcome:

Planning Performance Agreement (PPA)

Tall and contextually tall buildings can be very divisive within the communities in which they are proposed to be located. Entering into a Planning Performance Agreement (PPA) allows an ongoing dialogue with the Local Planning Authority (LPA), seeking to achieve a successful outcome for a development. The level of dialogue will be on a case-by-case basis.

Pre-Application Service

Not all instances will require an applicant to engage in a PPA. However, early discussion with the LPA through the pre-application service can assist in addressing any concerns with a development prior to formal submission of a planning application.

Design Review Panel (DRP)

Where appropriate, a presentation to the Harrow Design Review Panel (DRP) can be hugely beneficial to a scheme. Feedback from the DRP can be addressed through a schemes design evolution, resulting in a more robust process and a higher quality design.

Planning Policy Advisory Panel (PPAP)

In certain circumstances, especially with major schemes, presenting to the Planning Policy Advisory Panel (PPAP) can give applicants the opportunity to answer any questions that elected members may have in relation to their scheme.

RAF Northolt

Much of Harrow (specifically central Harrow and to the west of the borough), is constrained by the RAF Northolt safeguarding zones, which seek to consider height of new development in relation to the safe operations of the airport and air traffic using it. Safeguarding zones can be viewed on the Harrow Planning Policy Maps.

4.3.1 Document summary to be completed following PH briefing.

